

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA  
Lafayette Division**

**IN RE:**

**CASE NO. 16-50740**

**PROGRESSIVE ACUTE CARE, LLC, et al.**

**CHAPTER 11**

**DEBTORS**

**JOINTLY ADMINISTERED**

**MOTION FOR EXPEDITED HEARING**

**NOW INTO COURT**, through undersigned counsel, come Progressive Acute Care, LLC (“PAC”), Progressive Acute Care Avoyelles, LLC (“PAC Avoyelles”), Progressive Acute Care Oakdale, LLC (“PAC Oakdale”) and Progressive Acute Care Winn, LLC (“PAC Winn”) as debtors and debtors-in-possession (collectively, the “Debtors”), which request that the *Motion for Administrative Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [P-97] (“Motion”) be heard on an expedited basis on June 28, 2016 at 10:00 a.m., and respectfully represent as follows:

1.

On May 31, 2016 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the “Bankruptcy Code”).

2.

The Debtors own and operate three (3) community-based hospitals (“Hospitals”), ranging from 50-60 bed capacity, which provide inpatient, outpatient and emergency care, primarily for residents of the immediate regions of the Hospitals. The Hospitals are located in Marksville (PAC Avoyelles), Oakdale (PAC Oakdale) and Winnfield (PAC Winn).

3.

The Debtors seek entry of an order establishing certain interim compensation and expense reimbursement procedures for the professionals (“Professionals”) retained by the Debtors and apply to any official committee and its members, if appointed; and, request the Motion be heard on an expedited basis to enable the parties to closely monitor the costs of administration and allow the Debtors to maintain a more level cash flow availability and implement efficient cash management procedures.

4.

Counsel for the Debtors has contacted counsel for the Office of the United States Trustee, who has no objection to the relief requested herein

5.

Notice of this motion has been served upon i) the Debtors, through their counsel of record, ii) the Office of the United States Trustee; iii) secured creditors of the Debtors; (iv) the 20 largest unsecured creditors of each of the Debtors; and, (v) all parties requesting notices in these matters.

**WHEREFORE**, the Debtors respectfully request that this Honorable Court enter an order setting the Motion for hearing on an expedited basis on June 28, 2016 at 10:00 a.m., and for any and all other relief this Court deems necessary and proper.

Respectfully submitted by:

/s/ Barbara B. Parsons

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