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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

SOUND SHORE MEDICAL CENTER OF
WESTCHESTER, et al.

Chapter 11
Case No. 13- _____ ()

Debtors.

(Joint Administration Pending)

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**MOTION FOR ORDER PURSUANT TO
BANKRUPTCY RULE 1007(C) EXTENDING TIME FOR
FILING OF SCHEDULES AND STATEMENTS**

Sound Shore Medical Center of Westchester ("SSMC"), and certain of its debtor affiliates, as debtors and debtors-in-possession (each a "Debtor" and collectively the "Debtors")¹, in these chapter 11 cases (the "Chapter 11 Cases"), by and through their proposed attorneys, Garfunkel Wild, P.C., hereby move (the "Motion"), for entry of an Order pursuant to Bankruptcy Rule 1007(c) extending their time for filing schedules and statements. In support of the Motion, the Debtors rely in part on the Affidavit of John Spicer Pursuant to Local Rule 1007-2 and in Support of First Day Motions (the "Spicer Affidavit") and respectfully represent as follows:

¹ The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital, Inc. (0115), Howe Avenue Nursing Home d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514), and New Rochelle Sound Shore Housing, LLC (0117). There are certain additional affiliates of the Debtors who are not debtors in these Chapter 11 Cases and have not sought relief under Chapter 11.

SUMMARY OF RELIEF REQUESTED

1. By this Motion, the Debtors seek entry of an order, in the form attached hereto as Exhibit A, pursuant to Rules 1007(a)(5) and (c) of the Federal Rules of Bankruptcy Procedure (as amended, the “**Bankruptcy Rules**”) (i) extending for a period of approximately thirty (30) days, the fifteen-day period established by Bankruptcy Rule 1007(c) within which they must file list of equity holders, schedules of assets and liabilities, statements of financial affairs, statements of executory contracts and unexpired leases, and schedules of current income and expenditures (the “**Schedules and Statements**”).

2. In view of the amount of work entailed in completing such a project, and the competing demands upon the Debtors’ employees in the initial postpetition period, the Debtors likely will not be able to satisfactorily prepare the Schedules and Statements within fifteen days as outlined in Bankruptcy Rule 1007(c). Accordingly, the Debtors respectfully request an extension of such time for approximately thirty (30) additional days, through June 28, 2013, without prejudice to their right to request a further extension.

JURISDICTION AND VENUE

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue of this case and this Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicate for the relief sought herein is Bankruptcy Rules 1007(a)(5) and (c) and Local Rule 1007-1.

BACKGROUND

4. On the date hereof (the "Petition Date"), each of the Debtors filed a voluntary petition for reorganization under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

5. The Debtors remain in possession and operation of their assets and continue to manage their business as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

6. No examiner, trustee or creditors' committee has been appointed.

DEBTORS' HISTORY AND BUSINESS

7. The factual background regarding the Debtors, including their current and historical business operations and the factors which precipitated the filing of these Chapter 11 Cases, are set forth in detail in the Spicer Affidavit. In the interest of brevity, the facts and statements set forth in the Spicer Affidavit are incorporated herein by reference.

RELIEF REQUESTED

8. The Debtors seek entry of an Order, pursuant to Rules 1007(a)(5) and (c) of the Bankruptcy Rules, extending the time within which the Debtors must file their Schedules and Statements. The Debtors request an extension of thirty (30) days, through June 28, 2013, to file the Schedules and Statements.

9. The Debtors were unable to compile the necessary information required to complete and file the Schedules and Statements prior to the Petition Date due to (a) the sizeable

scope of the Debtors' businesses; (b) the complexity of their financial affairs; (c) the limited time and staffing available to perform the necessary, comprehensive internal review of their accounts and affairs; (d) the ongoing pressures faced by the Debtors with respect to the administrative preparation required for the filing of this case; and (e) business exigencies incident to the commencement of the Debtors' Chapter 11 Cases, including the effort to finalize an asset purchase agreement with MMC and a complicated postpetition financing arrangement.

10. Pursuant to Bankruptcy Rule 1007(c), chapter 11 debtors must file their Schedules and Statements within fifteen (15) days of the Petition Date if the petition is accompanied by a list of the debtors' creditors and their addresses, as in these Chapter 11 Cases. In the case at hand, the Schedules and Statements would be due on June 13, 2013 (the "**Filing Deadline**"). Bankruptcy Rule 1007(c) allows the Court to grant an extension of the Filing Deadline upon a showing of cause.

11. Good cause exists for the Debtors to be granted an extension of time to complete and file their Schedules and Statements, as required under Section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c).

12. Due to the complexity and diversity of their operations, the Debtors anticipate that they will be unable to complete their Schedules and Statements within the 15 day deadline imposed under Bankruptcy Rule 1007(c).

13. To prepare the required Schedules and Statements, the Debtors must compile information from books, records and documents relating to a multitude of transactions.

Collection of the necessary information requires an expenditure of substantial time and effort on the part of the Debtors' employees in excess of the 15 day period provided by Bankruptcy Rule 1007. Given the significant burdens already imposed on the Debtors' management by the commencement of these Chapter 11 Cases, the Debtors request additional time to complete and file the required Schedules and Statements. The Debtors have mobilized their employees to work diligently on the assembly of the necessary information.

14. The Debtors recognize the importance of the Schedules and Statements and anticipate that they will be able to file the Schedules and Statements, all in the appropriate formats prescribed by the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules of the Southern District of New York, on or before June 28, 2013. Accordingly, the Debtors request an extension of time to file their Schedules and Statements for approximately thirty (30) days, through and including June 28, 2013, without prejudice to their rights to seek a further extension for cause shown. Further, Bankruptcy Rule 1007(c) provides for the extension, for cause, of the time for the filing of the Schedules and Statements.

15. Courts in this district have also routinely granted similar extensions in other chapter 11 cases. See, e.g., In re Saint Vincents Catholic Medical Center, et al., Case No. 10-11963 (CGM) (Bankr. S.D.N.Y. April 14, 2010); In re Cabrini Medical Center, Case No. 09-14398 (AJG) (Bankr.S.D.N.Y. July 9, 2009); In re Our Lady of Mercy Medical Center, et al., Case No. 07-10609 (REG) (Bankr. S.D.N.Y. March 9, 2007); In re Casual Male, Inc., Case No. 01-41404 (Bankr. S.D.N.Y. May 18, 2001); In re Sunbeam Corp., Case No. 01-40291 (AJG) (Bankr. S.D.N.Y. Feb. 6, 2001).

16. In view of the size of these Chapter 11 Cases and the complexity of the Debtors' business operations and financial affairs, and the amount of information that must be assembled and compiled, ample cause exists for the requested extension.

NOTICE

17. As of the filing of this Motion, no trustee, examiner or creditors' committee has been appointed in these Chapter 11 Cases. Notice of this Motion has been given to (a) United States Trustee; (b) the Debtors' material prepetition and postpetition secured lenders or any agent therefore; (c) the holders of the 30 largest unsecured claims on a consolidated basis; (d) the following state and local taxing and regulatory authorities: (i) the Centers for Medicare and Medicaid Services, (ii) the New York State Department of Health, (iii) the United States Attorney for the Southern District of New York, (iv) the Attorney General of the State of New York; (v) the Westchester County Attorney; (vi) the New Rochelle City Attorney, (vii) the Internal Revenue Service; (viii) the New York State Department of Taxation and Finance; (e) counsel to MMC; (f) the United States Department of Justice; (g) the United States Department of Health and Human Services and (h) all parties in interest who have requested notice pursuant to Bankruptcy Rule 2002. Inasmuch as no trustee, examiner or creditors' committee has been appointed in this case, Applicant submits that no further notice need be given.

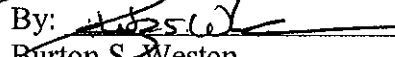
NO PRIOR REQUEST

18. No previous request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form annexed hereto as Exhibit A granting the relief requested herein, and such other and further relief as may be just and proper.

Dated: May 29, 2013
Great Neck, New York

GARFUNKEL WILD, P.C.

By: 
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*Proposed Attorneys for Debtors
and Debtors in Possession*

Exhibit A

Form of Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

SOUND MEDICAL CENTER OF
WESTCHESTER, et al.

Debtors.

Chapter 11
Case No. 13-_____ ()

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**ORDER PURSUANT TO BANKRUPTCY RULE 1007(C)
EXTENDING THE TIME TO FILE SCHEDULES AND STATEMENT**

Upon the Motion (the “**Motion**”)² of Sound Shore Medical Center of Westchester (“**SSMC**”) and certain of its affiliates, as Chapter 11 debtors and debtors in possession (each a “**Debtor**” and collectively the “**Debtors**”)³, dated May 29, 2013, for an Order, pursuant to Rules 1007(a)(5) and (c) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), extending the time by which the Debtors must file their schedules and statements of financial affairs (collectively, the “**Schedules and Statements**”), and this Court having jurisdiction to hear and consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that the Motion is a core proceeding pursuant to 28 U.S.C. §§ 157; and the Debtors having shown sufficient cause for the grant of such request, and due and appropriate notice of the Motion and this Order having been given; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtors, the Debtors’ creditors, all

² Capitalized terms used herein, unless otherwise defined, shall have the meaning given to them in the Motion.

³ The debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number include: Sound Shore Health System, Inc. (1398), Sound Shore Medical Center of Westchester (0117), The Mount Vernon Hospital, Inc. (0115), Howe Avenue Nursing Home d/b/a Helen and Michael Schaffer Extended Care Center (0781), NRHMC Services Corporation (9137), The M.V.H. Corporation (1514) and New Rochelle Sound Shore Housing, LLC (). There are certain additional affiliates of the Debtors who are not debtors in these Chapter 11 Cases and have not sought relief under Chapter 11.

parties-in-interest, and the Debtors' estates; and upon all of the proceedings had before the Court; and after due deliberation having been had an sufficient cause appearing therefor; it is

ORDERED, that the Motion be and hereby is granted; and it is further

ORDERED, in accordance with Bankruptcy Rules 1007(a)(5) and (c), the Debtors are granted an extension of the Filing Deadline until June 28, 2013; and it is further

ORDERED, that entry of this Order be, and it hereby is, without prejudice to the Debtors' request for additional extensions of time to file their Schedules and Statements.

Dated: White Plains, New York
May____, 2013

United States Bankruptcy Judge

NO OBJECTION:

Office of the United States Trustee

By:_____