

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: : Chapter 11
  
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PROMISE HEALTHCARE GROUP, LLC, *et al.*,<sup>1</sup> : Case No. 18-12491 (CSS)
  
:
  
Debtors. : (Jointly Administered)
  
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**NOTICE OF AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON DECEMBER 4, 2018 AT 11:00 A.M. (ET)**<sup>2</sup>

**ADJOURNED MATTERS:**

1. Application of the Debtors, Pursuant to Sections 327(a) and 329(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b) and 6003 and Local Rules 2014-1 and 2016-1, for an Order Authorizing Them to Retain and Employ DLA Piper LLP (US) as Counsel, *Nunc Pro Tunc* to the Petition Date [D.I. 97; filed 11/14/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to December 4, 2018 for U.S. Trustee and Committee.

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<sup>1</sup> The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: HLP HealthCare, Inc. (8381), PH-ELA, Inc. (9180), Professional Rehabilitation Hospital, L.L.C. (5340), Promise Healthcare #2, Inc. (1913), Promise Healthcare Group, LLC (1895), Promise Healthcare Holdings, Inc. (2601), Bossier Land Acquisition Corp. (6644), HLP of Los Angeles, LLC (9102), HLP of Shreveport, Inc. (1708), HLP Properties at The Villages Holdings, LLC (0006), HLP Properties at the Villages, L.L.C. (1938), HLP Properties of Vidalia, LLC (4255), HLP Properties, Inc. (0068), Promise Healthcare of California, Inc. (9179), Promise Healthcare, Inc. (7953), Promise Hospital of Ascension, Inc. (9219), Promise Hospital of Baton Rouge, Inc. (8831), Promise Hospital of Dade, Inc. (7837), Promise Hospital of Dallas, Inc. (0240), Promise Hospital of East Los Angeles, L.P. (4671), Promise Hospital of Florida at The Villages, Inc. (2171), Promise Hospital of Louisiana, Inc. (4886), Promise Hospital of Lee, Inc. (8552), Promise Hospital of Overland Park, Inc. (5562), Promise Hospital of Phoenix, Inc. (1318), Promise Hospital of Salt Lake, Inc. (0659), Promise Hospital of Vicksburg, Inc. (2834), Promise Hospital of Wichita Falls, Inc. (4104), Promise Properties of Dade, Inc. (1592), Promise Properties of Lee, Inc. (9065), Promise Properties of Shreveport, LLC (9057), Promise Skilled Nursing Facility of Overland Park, Inc. (5752), Promise Skilled Nursing Facility of Wichita Falls, Inc. (1791), Quantum Health, Inc. (4298), Quantum Properties, L.P. (8203), St. Alexius Hospital Corporation #1 (2766), St. Alexius Properties, LLC (4610), Success Healthcare 1, LLC (6535), Success Healthcare 2, LLC (8861), Success Healthcare, LLC (1604), Vidalia Real Estate Partners, LLC (4947), LH Acquisition, LLC (2328), Promise Behavioral Health Hospital of Shreveport, Inc. (1823), Promise Rejuvenation Centers, Inc. (7301), Promise Rejuvenation Center at the Villages, Inc. (7529), and PHG Technology Development and Services Company, Inc. (7766). The mailing address for the Debtors, solely for purposes of notices and communications, is 999 Yamato Road, 3<sup>rd</sup> FL, Boca Raton, FL 33431.

<sup>2</sup> Any party participating telephonically must make arrangements through CourtCall by telephone (866-582-6878) or facsimile (866-533-2946).

**Related Pleadings:**

- (a) Supplemental Declaration of Stuart M. Brown in Support of the Application of the Debtors, Pursuant to Sections 327(a) and 329(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a), 2016(b) and 6003 and Local Rules 2014-1 and 2016-1, for an Order Authorizing Them to Retain and Employ DLA Piper LLP (US) as Counsel, *Nunc Pro Tunc* to the Petition Date [D.I. 174; filed 11/29/18].

**Responses Received:** None.

**Status:** This matter is adjourned to December 11, 2018 at 11:00 a.m.

2. Debtors' Application for an Order Authorizing Retention of McDermott Will & Emery LLP as Special Counsel for the Silver Lake Debtors in Connection with the Sale of Silver Lake Medical Center, Pursuant to Bankruptcy Code Section 327(e), *Nunc Pro Tunc* to the Petition Date [D.I. 102; filed 11/14/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to December 4, 2018 for U.S. Trustee and Committee.

**Related Pleadings:** None.

**Responses Received:** None.

**Status:** This matter is adjourned to December 11, 2018 at 11:00 a.m.

3. Application of the Debtors and Debtors in Possession, for an Order Authorizing the Retention and Employment of MTS Health Partners, L.P. as Investment Banker for the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [D.I. 103; filed 11/14/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to December 4, 2018 for U.S. Trustee and Committee.

**Related Pleadings:** None.

**Responses Received:** None.

**Status:** This matter is adjourned to December 11, 2018 at 11:00 a.m.

4. Application of the Debtors and Debtors in Possession, for an Order Authorizing the Retention of Waller Lansden Dortch & Davis, LLP as Counsel for the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [D.I. 104; filed 11/15/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to December 4, 2018 for U.S. Trustee and Committee.

**Related Pleadings:** None.

**Responses Received:** None.

**Status:** This matter is adjourned to December 11, 2018 at 11:00 a.m.

5. Application of the Debtors and Debtors in Possession, for an Order Authorizing the Retention and Employment of Houlihan Lokey Capital, Inc. as Financial Advisor and Investment Banker for the Debtors and Debtors in Possession, *Nunc Pro Tunc* to the Petition Date [D.I. 105; filed 11/15/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to December 4, 2018 for U.S. Trustee and Committee.

**Related Pleadings:** None.

**Responses Received:** None.

**Status:** This matter is adjourned to December 11, 2018 at 11:00 a.m.

6. Motion of the Debtors for Entry of an Order Approving Key Employee Incentive Plan [D.I. 106; filed 11/15/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to January 3, 2018 for U.S. Trustee and Committee.

**Related Pleadings:**

- (a) Declaration of Andrew Hinkelman in Support of the Motion of the Debtors for Entry of an Order Approving the Key Employee Incentive Plan [D.I. 108; filed 11/15/18].

**Responses Received:** None.

**Status:** This matter is adjourned to January 8, 2018 at 11:00 a.m.

7. Motion of the Debtors for Entry of an Order Pursuant to 11 U.S.C. 105(a) and 363(b) (I) Authorizing the Debtors to Employ FTI Consulting, Inc. and (II) Approving the Designation of Andrew Hinkelman as Debtors' Interim Chief Financial Officer and Chief Restructuring Officer [D.I. 113; filed 11/15/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to December 4, 2018 for U.S. Trustee and Committee.

**Related Pleadings:** None.

**Responses Received:** None.

**Status:** This matter is adjourned to December 11, 2018 at 11:00 a.m.

**MATTERS WITH CERTIFICATION OF COUNSEL/NO OBJECTION (COC/CNO):**

8. Motion of the Debtors for Entry of an Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [D.I. 8; filed 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [D.I. 49; filed 11/6/18].
- (b) Certification of Counsel Regarding Final Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [D.I. \_\_; filed \_\_/\_\_/18].

**Responses Received:** None.

**Status:** The Debtors intend to file a Certification of Counsel prior to the hearing submitting a revised proposed order resolving all informal comments received.

9. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Maintain, Administer, Modify, and Renew Their Refund Programs and Practices and (II) Honor Obligations Related Thereto [D.I. 11; filed 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order Authorizing the Debtors to (I) Maintain, Administer, Modify, and Renew Their Refund Programs and Practices and (II) Honor Obligations Related Thereto [ D.I. 42; filed 11/6/18].
- (b) Certification of Counsel Regarding Final Order Authorizing the Debtors to (I) Maintain, Administer, Modify, and Renew Their Refund Programs and Practices and (II) Honor Obligations Related Thereto [D.I. \_\_; filed \_\_/\_\_/18].

**Responses Received:** None.

**Status:** The Debtors intend to file a Certification of Counsel prior to the hearing submitting a revised proposed order resolving all informal comments received.

10. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto; (II) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies; (III) Honor the Terms of the Premium Financing Agreements and Pay Premiums Thereunder; and (IV) Enter Into New Premium Financing Agreements in the Ordinary Course Of Business [D.I. 13; filed 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order Authorizing the Debtors to (I) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto; (II) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies; (III) Honor the Terms of the Premium Financing Agreements and Pay Premiums Thereunder; and (IV) Enter Into New Premium Financing Agreements in the Ordinary Course Of Business [D.I. 45; filed 11/6/18].
- (b) Certification of Counsel Regarding Final Order Authorizing the Debtors to (I) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto; (II) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies; (III) Honor the Terms of the Premium Financing Agreements and Pay Premiums Thereunder; and (IV) Enter Into New Premium Financing Agreements in the Ordinary Course Of Business [D.I. \_\_; filed \_\_/\_\_/18].

**Responses Received:** None.

**Status:** The Debtors intend to file a Certification of Counsel prior to the hearing submitting a revised proposed order resolving all informal comments received.

11. Debtors' Omnibus Motion For Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts Nunc Pro Tunc to the Petition Date and (II) Granting Related Relief [D.I. 74; filed ].

**Response Deadline:** November 23, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Certificate of No Objection Regarding Debtors' Omnibus Motion For Entry of an Order (I) Authorizing the Debtors to Reject Certain Executory Contracts Nunc Pro Tunc to the Petition Date and (II) Granting Related Relief [D.I. 164; filed 11/28/18].

**Responses Received:** None.

**Status:** A Certificate of No Objection has been filed. No hearing is necessary unless the Court has questions.

12. Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. 109; filed 11/15/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Certification of Counsel Regarding Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [D.I. \_\_; filed \_\_/\_\_/18].

**Responses Received:** None.

**Status:** The Debtors intend to file a Certification of Counsel prior to the hearing submitting a revised proposed order resolving all informal comments received.

13. Motion of the Debtors for Entry of an Order Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business [D.I. 114; filed 11/15/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Certification of Counsel Regarding Motion of the Debtors for Entry of an Order Authorizing the Retention and Compensation of Certain Professionals Utilized in the Ordinary Course of Business [D.I. \_\_; filed \_\_/\_\_/18].

**Responses Received:** None.

**Status:** The Debtors intend to file a Certification of Counsel prior to the hearing submitting a revised proposed order resolving all informal comments received.

**MATTERS GOING FORWARD:**

14. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections By Utility Companies, and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [D.I. 9].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order (I) Authorizing Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures For Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [D.I. 54; filed 11/6/18].

**Responses Received:**

- (a) Objection of Certain Utility Companies to the Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors Proposed Form of Adequate Assurance of Payment To Utility Companies, (II) Establishing Procedures For Resolving Objections By Utility Companies, and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [D.I. 142; filed 11/21/18].

**Status:** This matter is going forward.

- 15. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System and Bank Accounts; (II) Extending the Time to Comply With, or Seek a Waiver of, Certain United States Trustee Requirements and Section 345(B) of the Bankruptcy Code; (III) Authorizing Continued Performance of Intercompany Transactions; (IV) Granting Administrative Expense Priority to Postpetition Intercompany Claims; and (V) Granting Related Relief [D.I. 10; filed 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order (I) Authorizing Continued Use of Existing Cash Management System and Bank Accounts, (II) Extending the Time to Comply With, or Seek a Waiver of, Certain United States Trustee Requirements and Section 345(b) of the Bankruptcy Code, (III) Authorizing Continued Performance of Intercompany Transactions, (IV) Granting Administrative Expense Priority to Postpetition Intercompany Claims, and (V) Granting Related Relief [D.I. 52; filed 11/6/18].

**Responses Received:**

- (a) Objection of the Official Committee of Unsecured Creditors to Motion of the Debtors for Entry of Interim and Final Orders (i) Authorizing Continued Use of Existing Cash Management System and Bank Accounts; (ii) Extending the Time to Comply With, or Seek a Waiver of, Certain United States Trustee Requirements and Section 345(b) of the Bankruptcy Code; (iii) Authorizing Continued Performance of Intercompany Transactions; (iv) Granting Administrative Expense Priority to Postpetition Intercompany Claims; and (v) Granting Related Relief [D.I. 167; filed 11/29/18].

**Status:** This matter is going forward.

16. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Critical Vendors Obligations [D.I. 12; filed 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Critical Vendors Obligations [D.I. 43; filed 11/6/18].

**Responses Received:**

- (a) Omnibus Objection of the Official Committee of Unsecured Creditors to (i) the Motion of The Debtors For Entry of Final Orders (I) Authorizing The Debtors to (A) Pay Certain Prepetition Wages, Benefits and Other Compensation, and (B) Continue Employee Compensation and Employee Benefits Programs, and (II) Granting Related Relief and (ii) the Motion of the Debtors for Entry of Final Order (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Critical Vendors Obligations [D.I. 170; filed 11/29/18].

**Status:** This matter is going forward.

17. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Certain Prepetition Wages, Benefits and Other Compensation, and (B) Continue Employee Compensation and Employee Benefits Programs, and (II) Granting Related Relief [D.I. 14; 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:**

- (a) Interim Order (I) Authorizing the Debtors to (A) Pay Certain Prepetition Wages, Benefits and Other Compensation, and (B) Continue Employee Compensation and Employee Benefits Programs, and (II) Granting Related Relief [D.I. 46; filed 11/6/18].



**Responses Received:**

- (a) Omnibus Objection of the Official Committee of Unsecured Creditors to (i) the Motion of The Debtors For Entry of Final Orders (I) Authorizing The Debtors to (A) Pay Certain Prepetition Wages, Benefits and Other Compensation, and (B) Continue Employee Compensation and Employee Benefits Programs, and (II) Granting Related Relief and (ii) the Motion of the Debtors for Entry of Final Order (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Critical Vendors Obligations [D.I. 170; filed 11/29/18].

**Status:** This matter is going forward.

- 18. Motion of the Debtors for Entry of an Order Authorizing the Debtors to File Under Seal Certain Portions of Its Creditor Matrix Containing Certain Individual Creditor Information [D.I. 15; filed 11/5/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.

**Related Pleadings:** None.

**Responses Received:**

- (a) Objection of the United States Trustee to the Debtors' Motion to File Under Seal Portions of Its Creditor Matrix Containing Certain Individual Creditor Information [D.I. 137; filed 11/20/18].
- (b) Debtors' Reply to Objection of the United States Trustee to the Debtors' Motion to File Under Seal Portions of Its Creditor Matrix Containing Certain Individual Creditor Information [D.I. 175; filed 11/30/18].

**Status:** This matter is going forward.

- 19. Debtors' Motion For Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Secured Financing Pursuant to Section of the Bankruptcy Code, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [D.I. 17; filed 11/6/18].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to November 29, 2018 at 12:00 p.m. for the Department of Justice; extended to November 29, 2018 for Committee and U.S. Trustee.

**Related Pleadings:**

- (a) Notice of Filing Revised Exhibit B to the DIP Motion [D.I. 39; filed 11/6/18].
- (b) Interim Order (I) Authorizing the Debtors to Obtain Postpetition Financing, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Providing Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Parties, (V) Modifying Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [D.I. 54; filed 11/6/18].
- (c) Supplemental Declaration of Andrew Hinkelman in Support of the DIP Financing Motion [D.I. 77; filed 11/9/18].

**Responses Received:**

- (a) Dallas County's Objection to Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtors to Obtain Postpetition Secured Financing Pursuant to Section 363 of the Bankruptcy Code,... (III) Granting Liens and Superpriority Administrative Expenses Status,... and (VII) Granting Related Relief [D.I. 162; filed 11/27/18].
- (b) United States' Objection to the Debtors' Motion For Entry of a Final Order (I) Authorizing Debtors to Obtain Postpetition Secured Financing Pursuant to Section of the Bankruptcy Code, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [D.I. 165; filed 11/29/18].

**Status:** This matter is going forward.

- 20. Debtors' Motion for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of Certain of the Debtors' Assets, Including Approving a Break-Up Fee and Expense Reimbursement, (B) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts, (C) Approving Form and Manner of Notice Relating Thereto, and (D) Scheduling a Hearing to Consider the Proposed Sale; (II)(A) Approving the Sale of Certain of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Authorizing Success Healthcare 1, LLC to Grant Liens; and (III) Granting Related Relief Fee [Silver Lake] [D.I. 37].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to November 28, 2018 for U.S. Trustee; extended to November 29, 2018 for Committee.

**Related Pleadings:**

- (a) Notice of Motion and Hearing [D.I. 73; filed 11/8/18].

**Responses Received:**

- (a) Objection of Strategic Global Management, Inc. to Debtors' Motion for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of Certain of the Debtors' Assets, Including Approving a Break-Up Fee and Expense Reimbursement, (B) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts, (C) Approving Form and Manner of Notice Relating Thereto, and (D) Scheduling a Hearing to Consider the Proposed Sale; (II)(A) Approving the Sale of Certain of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Authorizing Success Healthcare 1, LLC to Grant Liens; and (III) Granting Related Relief [D.I. 158; filed 11/27/18].
- (b) Supplemental Objection of Strategic Global Management, Inc. to Debtors' Motion for Entry of Orders (I)(A) Establishing Bidding Procedures Relating to the Sale of Certain of the Debtors' Assets, Including Approving a Break-Up Fee and Expense Reimbursement, (B) Establishing Procedures Relating to the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, Including Notice of Proposed Cure Amounts, (C) Approving Form and Manner of Notice Relating Thereto, and (D) Scheduling a Hearing to Consider the Proposed Sale; (II)(A) Approving the Sale of Certain of the Debtors Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) Authorizing the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, and (C) Authorizing Success Healthcare 1, LLC to Grant Liens; and (III) Granting Related Relief [D.I. 166; filed 11/29/18].
- (c) Objection of the Official Committee of Unsecured Creditors to Debtors Motion For Entry Of Orders (I) (A) Establishing Bidding Procedures Relating To The Sale Of Certain Of The Debtors Assets, Including Approving A Break-Up Fee And Expense Reimbursement, (B) Establishing Procedures Relating To The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, Including Notice Of Proposed Cure Amounts, (C) Approving Form And Manner Of Notice Relating Thereto, And (D) Scheduling A Hearing To Consider The Proposed Sale; (II) (A) Approving The Sale Of Certain Of The Debtors Assets Free And Clear Of All Liens, Claims, Encumbrances, And Interests(B) Authorizing The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, And (C) Authorizing Success Healthcare 1, LLC To Grant Liens; And (III) Granting Related Relief [D.I. 173; filed 11/29/18].

**Status:** This matter is going forward.

21. Motion of the Debtors for Entry of an Order (I) Authorizing the Sale of Certain Real Property Free and Clear of all Liens, Claims, Interests, and Encumbrances, and (II) Authorizing the Debtors to Reject Unexpired Lease of Nonresidential Real Property [San Diego] [D.I. 87].

**Response Deadline:** November 27, 2018 at 4:00 p.m.; extended to November 29, 2018 for Committee; extended to November 29, 2018 at 5:00 p.m. for Wells Fargo.

**Related Pleadings:** None.

**Responses Received:**

- (a) Limited Objection [of Wells Fargo Bank] to Motion of the Debtors for Entry of an Order (I) Authorizing the Sale of Certain Real Property Free and Clear of All Liens, Claims, Interests, and Encumbrances, and (II) Authorizing the Debtors to Reject Unexpired Lease of Nonresidential Real Property [D.I. 168; filed 11/29/18].
- (b) The Official Committee of Unsecured Creditors' Objection to the Debtors' Sale Motion [D.I. 172; filed 11/29/18].

**Status:** This matter is going forward.

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Dated: November 30, 2018  
Wilmington, Delaware

DLA PIPER LLP (US)

/s/ Stuart M. Brown

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*Proposed Attorneys for the Debtors and  
Debtors in Possession*