

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.*,¹ : Case No. 18-12491 (CSS)

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Debtors. : (Jointly Administered)

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NOTICE OF THIRD AMENDED² AGENDA OF MATTERS SCHEDULED FOR
HEARING ON OCTOBER 15, 2019 AT 10:00 A.M. (ET)³

****AS THERE ARE NO MATTERS GOING FORWARD, THIS HEARING HAS BEEN CANCELLED WITH THE PERMISSION OF THE COURT****

MATTERS GOING FORWARD:

ADVERSARY PROCEEDINGS:

1. *Success Healthcare, LLC, et al. v. B2 Environmental, Inc.* (19-50287)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant B2 Environmental, Inc., (II) Declaring That Defendant Has Failed To Comply With California Mechanics Lien Law And That Defendants Potential Lien Is Invalid, And (III) Authorizing The Release Of The Potential Lien Reserve [D.I. 7,

¹ 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), 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), Success Healthcare 1, LLC (6535), 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, 3rd FL, Boca Raton, FL 33431.

² **Amended items appear in bold.**

³ Any party participating telephonically must make arrangements through CourtCall by telephone (866-582-6878) or facsimile (866-533-2946).

Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents:

- A. Request for Entry of Default [D.I. 5, Filed October 4, 2019]
- B. Affidavit of Stuart M. Brown In Support Of Request For Entry Of Default [D.I. 6, Filed October 4, 2019]
- C. Entry of Default [D.I. 8, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant B2 Environmental. This matter will proceed as a status conference.

2. *Success Healthcare, LLC, et al. v. airandvac.com* (19-50288)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant Airandvac.Com, (II) Declaring That Defendants Potential Lien Is Invalid, And (III) Authorizing The Release Of The Potential Lien Reserve [D.I. 7, Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents

- A. Request for Entry of Default [D.I. 5, Filed October 4, 2019] [D.I. 5, Filed October 4, 2019]
- B. Affidavit Of Stuart M. Brown In Support Of Request For Entry Of Default [D.I. 6, Filed October 4, 2019]
- C. Entry of Default [D.I. 8, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant airandvac.com. This matter will proceed as a status conference.

3. *Success Healthcare, LLC, et al. v. Griff's Electric, Inc.* (19-50289)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant Griffs Electric, INC., (II) Declaring That Defendants Potential Lien Is Invalid, And (III) Authorizing The Release Of The Potential Lien Reserve [D.I. 7, Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents:

- A. Request for Entry of Default [D.I. 5, Filed October 4, 2019]
- B. Affidavit Of Stuart M. Brown In Support Of Request For Entry Of Default [D.I. 6, Filed October 4, 2019]
- C. Entry of Default [D.I. 8, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant Griff's Electric, Inc. This matter will proceed as a status conference.

- 4. *Success Healthcare, LLC, et al. v. Metropolitan Elevator Co, Inc.* (19-50290)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant Metropolitan Elevator Co, Inc., (II) Declaring That Defendants Potential Lien Is Invalid, And (III) Authorizing The Release Of The Potential Lien Reserve [D.I. 7, Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents:

- A. Request for Entry of Default [D.I. 5, Filed October 4, 2019]
- B. Affidavit Of Stuart M. Brown In Support Of Request For Entry Of Default [D.I. 6, Filed October 4, 2019]
- C. Entry of Default [D.I. 8, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant Metropolitan Elevator Co, Inc. This matter will proceed as a status conference.

- 5. *Success Healthcare, LLC, et al. v. Smith Emery Laboratories, Inc.* (19-50291)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant Smith Emery Laboratories, Inc., (II) Declaring That Defendants Potential Lien Is Invalid, And (III) Authorizing The Release Of The Potential Lien Reserve [D.I. 7, Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents:

- A. Request for Entry of Default [D.I. 5, Filed October 4, 2019]
- B. Affidavit Of Stuart M. Brown In Support Of Request For Entry Of Default [D.I.

6, Filed October 4, 2019]

C. Entry of Default [D.I. 8, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant Smith Emery Laboratories, Inc. This matter will proceed as a status conference.

6. *Success Healthcare, LLC, et al. v. Sierra Fireproofing, Inc.* (19-50292)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant Sierra Fireproofing, Inc., (II) Declaring That Defendants Asserted Lien Is Invalid, And (III) Authorizing The Release Of The Potential Lien Reserve [D.I. 8, Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents:

- A. Request for Entry of Default [D.I. 6, Filed October 4, 2019]
- B. Affidavit Of Stuart M. Brown In Support Of Request For Entry Of Default [D.I. 7, Filed October 4, 2019]
- C. Entry of Default [D.I. 9, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant Sierra Fireproofing, Inc. This matter will proceed as a status conference.

7. *Success Healthcare, LLC, et al. v. Precision Works, Inc.* (19-50293)
Motion Of The Silver Lake Debtors For Entry Of An Order (I) Entering Default Judgment Against Defendant Precision Works, Inc. dba Precision Environmental; (II) Declaring That Defendants Potential Lien Is Invalid; (III) Authorizing The Release Of Potential Lien Reserve Funds; And (IV) Reclassifying Proofs Of Claim Nos. 246 And 250 As General Unsecured Claims [D.I. 7, Filed October 4, 2019]

Response Deadline: October 16, 2019 AT 4:00 P.M. (ET)

Related Documents:

- A. Request for Entry of Default [D.I. 5, Filed October 4, 2019]
- B. Affidavit Of Stuart M. Brown In Support Of Request For Entry Of Default [D.I. 6, Filed October 4, 2019]
- C. Entry of Default [D.I. 8, October 7, 2019]

Responses Received: None.

Status: The Clerk's Office has entered a default against defendant Precision Works, Inc. This matter will proceed as a status conference.

UNCONTESTED MATTERS WITH CERTIFICATION OF COUNSEL (COC/CNO):

8. Motion of Richard L. Brown, By and Through His Successors-in-Interest, Shellee Renaud, Richard Brown, Jr., Derek Brown and Darren Brown for Relief from the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [D.I. 1446; Filed 9/11/19].

Response Deadline: September 30, 2019 at 4:00 p.m. (ET). Extended for the Debtors to October 1, 2019 at 4:00 p.m. (ET).

Related Documents:

- A. Certification of Counsel Regarding Order Granting Relief From Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code [Brown] [D.I. 1515, Filed October 10, 2019]

Responses Received: Informal comments.

Status: A Certification of Counsel has been filed. No hearing is necessary, unless the Court has questions.

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MATTERS CONTINUED TO OMNIBUS HEARING ON NOVEMBER 14, 2019

9. Koslow Adequate Protection Escrow

Response Deadline: N/A

Related Documents:

- A. Motion of the Debtors for Entry of an Order (I) Authorizing the Sale of Certain Louisiana Facilities and Related Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Authorizing the Seller to Assume and Assign Certain Executory Contracts and Unexpired Leases, and (III) Granting Other Related Relief [D.I. 672; Filed 2/04/19].
- B. Amended Order (I) Authorizing the Sale of Certain Louisiana Facilities and Related Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Authorizing the Seller to Assume and Assign Certain Executory Contracts and Unexpired Leases, and (III) Granting Other Related Relief [D.I. 788; Filed 2/19/19].
- C. Order Approving Amendment to Asset Purchase Agreement Entered into with Lexmark Holdings LLC [D.I. 1222; Filed 6/21/19].
- D. Howard Koslow's Reservation of Rights Regarding Motion of the Debtors for Entry of an Order (I) Authorizing the Sale of Certain Louisiana Facilities and Related Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Authorizing the Sellers to Assume and Assign Certain Executory Contracts and Unexpired Leases, (III) Granting Liens, and (IV) Granting Other Related Relief [D.I. 1368, 8/20/19].
- E. Order Modifying Amended Lexmark Sale Order [D.I. 1410; Filed 8/29/19].

Responses Received: N/A

Status: This matter will go forward as a status conference at the hearing on November 14, 2019.

10. KPC Promise Healthcare, LLC Bid Protections and Security Deposit in Connection with Sale of Louisiana Facilities.

Response Deadline: N/A

Related Documents:

- A. Motion of the Debtors for Entry of an Order (I) Authorizing the Sale of Certain Louisiana Facilities and Related Assets Free and Clear of All Liens, Claims, Interests, and Encumbrances, (II) Authorizing the Sellers to Assume and Assign Certain Executory Contracts and Unexpired Leases, and (III) Granting Other Related Relief [D.I. 1323; Filed 8/09/19].
- B. Notice of Filing of Exhibits to KPC Sale Motion [D.I. 1360; Filed 8/17/19]

Status: This matter will go forward as a status conference at the hearing on November 14, 2019.

Dated: October 15, 2019
Wilmington, Delaware

DLA PIPER LLP (US)

/s/ Stuart M. Brown

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-and-

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