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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|----------------------------------|
| | § | |
| | § | |
| In re: | § | Chapter 11 |
| | § | |
| 4 West Holdings, Inc. <i>et al.</i> , ¹ | § | Case No. 18-30777 |
| | § | |
| Debtors. | § | (Joint Administration Requested) |
| | § | |
| | § | |

**MOTION OF THE DEBTORS FOR ENTRY OF AN ORDER (I) DIRECTING
JOINT ADMINISTRATION OF THEIR CHAPTER 11 CASES
AND (II) GRANTING RELATED RELIEF**

The above-captioned debtors (collectively the “Debtors”), by and through their proposed counsel, DLA Piper LLP (US), hereby submit this motion (the “Motion”) for entry of an order, substantially in the form attached hereto as **Exhibit B** (the “Proposed Order”), under Rules 1005, 1015(b), and 2002(n) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”),

¹ A list of the Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, is attached hereto as **Exhibit A**.

and Rule 1015-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), (a) directing the procedural consolidation and joint administration of the Debtors’ chapter 11 cases (the “Chapter 11 Cases”), and (b) granting certain related relief. In support of the Motion, the Debtors rely upon, and incorporate by reference, the *Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petitions and First Day Pleadings* (the “First Day Declaration”)² filed with the Court contemporaneously herewith. In further support of the Motion, the Debtors respectfully represent as follows:

JURISDICTION AND VENUE

1. The Court has jurisdiction over the Debtors, their estates, and this matter under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court under 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. On the date hereof (the “Petition Date”), each Debtor filed with this Court a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”).
4. The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or official committee of unsecured creditors has been appointed in the Debtors’ Chapter 11 Cases.
5. Additional information regarding the Debtors and these Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of these Chapter 11 Cases, is set forth in the First Day Declaration.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the First Day Declaration.

RELIEF REQUESTED

6. By this Motion, the Debtors respectfully request entry of an order, under Bankruptcy Rules 1005, 1015(b), and 2002(n), and Local Rule 1015-1, (a) directing the consolidation and joint administration of these Chapter 11 Cases, for procedural purposes only, (b) directing parties in interest to use a consolidated caption, indicating that any pleading filed in these cases relate to the jointly administered Chapter 11 Cases of “*4 West Holdings, Inc., et al.*,” and (c) granting related relief.

7. For the reasons set forth herein, the Debtors submit that the relief requested in this Motion is in the best interests of the Debtors, their estates, creditors and other parties in interest, and therefore, respectfully request that such relief should be granted.

BASIS FOR RELIEF REQUESTED

8. Bankruptcy Rule 1015(b) provides, in relevant part, “if a joint petition or two or more petitions are pending in the same court by or against . . . a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). Section 101(2) of the Bankruptcy Code, in turn, defines the term “affiliate,” in pertinent parts, as:

- (A) [an] entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor
- (B) [a] corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote, by the debtor, or by an entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor
- (C) [a] person whose business is operated under a lease or operating agreement by a debtor, or person substantially all of whose property is operated under an operating agreement with the debtor; or

- (D) an entity that operates the business or substantially all of the property of the debtor under a lease or operating agreement.

11 U.S.C. § 101(2).

- 9. Further, Local Rule 1015-1 states that, in relevant part:

When a case is filed for or against a debtor related to a debtor with a case pending in the Bankruptcy Court, a party in interest may file a motion for joint administration in each case.

Local Rule 1015-1.

10. As disclosed in the First Day Declaration, Debtor 4 West Investors, LLC directly or indirectly owns or controls at least 20% of the voting securities and/or membership interests (as applicable) of each of the other Debtor entities. As such, the Debtors are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, this Court is authorized to jointly administer these cases for procedural purposes under Bankruptcy Rule 1015(b) and Local Rule 1015-1.

11. The Debtors anticipate that numerous notices, applications, motions, other pleadings, hearings, and orders in these cases will affect several or all of the Debtors. The failure to jointly administer these 135 cases—each with its own case docket—would result in numerous duplicative filings for each issue. Further, joint administration will relieve the Court of entering duplicative orders and maintaining duplicative files and dockets. The Office of the United States Trustee (the “U.S. Trustee”) and other parties in interest will similarly benefit from joint administration of these Chapter 11 Cases, sparing them the time and effort of reviewing duplicative pleadings and papers.

12. Joint administration will save time and money and avoid such duplicative and potentially confusing filings by permitting counsel for all parties in interest to, among other things, (a) use a single caption on the numerous documents that will be served and filed in these

Chapter 11 Cases, (b) file the pleadings in one case rather than in multiple cases and (c) refer to one case docket in order to review all pleadings filed in these Chapter 11 Cases. Further, joint administration will protect parties in interest by ensuring that parties in each of the Debtors' respective cases will be apprised of the various matters before the Court in these Chapter 11 Cases.

13. The rights of the Debtors' creditors will not be adversely affected by joint administration of these Chapter 11 Cases because this Motion requests only the administrative consolidation of the estates for procedural purposes, and does not seek substantive consolidation. Each creditor and other party in interest will maintain whatever rights it has against the particular estate against which it allegedly has a claim or right. Furthermore, because these Chapter 11 Cases involve thousands of creditors, the entry of an order of joint administration will: (a) significantly reduce the volume of pleadings that otherwise would be filed with the Clerk of this Court, (b) render the completion of various administrative tasks less costly, and (c) minimize the number of unnecessary delays associated with the administration of numerous separate Chapter 11 Cases.

14. A proposed consolidated caption for all notices, applications, motions and other pleadings is annexed hereto as **Exhibit 1** to the Proposed Order (the "**Proposed Caption**"). Under section 342(c)(1) of the Bankruptcy Code, "[i]f notice is required to be given by the debtor to a creditor . . . such notice shall contain the name, address, and last four digits of the taxpayer identification number of the debtor." 11 U.S.C. § 342(c)(1). The Proposed Caption contains all of the required information, and therefore, the Debtors request that the Court find that the Proposed Caption satisfies the requirements of section 342(c) of the Bankruptcy Code.

15. The Debtors further submit that use of the Proposed Caption will eliminate cumbersome and confusing procedures and help ensure a uniformity of pleading identification. Additionally, case-specific information will be listed in the petitions for each Debtor, which are publicly available to parties in interest or will be provided by the Debtors upon request, and this information will be included in key notices to parties in interest, such as the notices required under Bankruptcy Rules 2002(a)(1), 2002(a)(7), and 2002(b), as applicable to chapter 11 cases. Therefore, the Debtors submit that the policies behind the requirements of section 342(c) of the Bankruptcy Code and Bankruptcy Rule 2002(n) have been satisfied.

16. The Debtors further request that an entry be made on the docket in the chapter 11 case of each other Debtor entity (other than 4 West Holdings, Inc.) substantially as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 11 Cases of 4 West Holdings, Inc. *et al.* The docket in Case No. 18-30777 should be consulted for all matters affecting this case.

17. Joint administration is generally non-controversial, and courts in this jurisdiction routinely order joint administration in cases with multiple related debtors. *See, e.g., In re Think Finance, LLC, et al.*, Case No. 17-33964 (Bankr. N.D. Tex. Oct. 23, 2017) [Dkt. No. 7]; *In re Preferred Care, Inc., et al.*, Case No. 17-44642 (Bankr. N.D. Tex. Nov. 13, 2017) [Dkt. Nos. 89, 104].; *In re Williams Financial Group, Inc., et al.*, Case No. 17-33578 (Bankr. N.D. Tex. Sept. 24, 2017) [Dkt No. 39].

18. Based on the foregoing, the Debtors submit that the relief requested is necessary and appropriate, is in the best interests of the Debtors, their estates, creditors and other parties in interest and, therefore, should be granted. No previous request for the relief sought herein has been made to this or any other court.

NOTICE

19. Notice of this Motion shall be provided to: (a) the U.S. Trustee; (b) the Office of the Attorney General of the states in which the Debtors operate Facilities; (c) the Debtors' forty (40) largest unsecured creditors on a consolidated basis; (d) counsel for Sterling National Bank; (e) counsel for OHI Asset RO, LLC and the DIP Lender; (f) the Internal Revenue Service; and (g) the Department of Medicaid, Department of Health, and Division of Health Services Regulation in each state in which the Debtors operate Facilities. The Debtors respectfully submit that such notice is sufficient and that no further notice of this Motion is required.

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CONCLUSION

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

Dated: March 6, 2018
Dallas, Texas

Respectfully submitted,

DLA PIPER LLP (US)

/s/ Andrew Zollinger

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Proposed Counsel for the Debtors

EXHIBIT A**(Sorted Alphabetically)**

| | Debtor Name | Case No. | EIN |
|-----|--|-----------------|------------|
| 1. | 4 West Holdings, Inc. | 18-30777 | 9732 |
| 2. | 4 West Investors, LLC | 18-30778 | 6021 |
| 3. | Aiken RE, LLC | 18-30850 | 1814 |
| 4. | Ambassador Rehabilitation and Healthcare Center, LLC | 18-30879 | 1636 |
| 5. | Anchor Rehabilitation and Healthcare Center of Aiken, LLC | 18-30868 | 9448 |
| 6. | Anderson RE TX, LLC | 18-30774 | 3630 |
| 7. | Anderson RE, LLC | 18-30861 | 1806 |
| 8. | Ark II Real Estate, LLC | 18-30840 | 3628 |
| 9. | Ark III Real Estate, LLC | 18-30847 | 0121 |
| 10. | Ark Mississippi Holding Company, LLC | 18-30788 | 3765 |
| 11. | Ark Real Estate, LLC | 18-30809 | 6014 |
| 12. | Ark South Carolina Holding Company, LLC | 18-30856 | 0002 |
| 13. | Ark Texas Holding Company, LLC | 18-30806 | 3739 |
| 14. | Battle Ground RE, LLC | 18-30825 | 1818 |
| 15. | Brushy Creek Rehabilitation and Healthcare Center, LLC | 18-30884 | 3292 |
| 16. | Bryan RE, LLC | 18-30775 | 3633 |
| 17. | Burleson RE, LLC | 18-30759 | 1777 |
| 18. | Capstone Rehabilitation and Healthcare Center, LLC | 18-30878 | 7871 |
| 19. | Charlottesville Pointe Rehabilitation and Healthcare Center, LLC | 18-30801 | 4467 |
| 20. | Charlottesville RE, LLC | 18-30829 | 0836 |
| 21. | Cleveland RE, LLC | 18-30811 | 6013 |
| 22. | Clinton RE, LLC | 18-30812 | 8109 |
| 23. | Cobblestone Rehabilitation and Healthcare Center, LLC | 18-30869 | 1612 |
| 24. | Collierville RE, LLC | 18-30841 | 8845 |
| 25. | Columbia RE, LLC | 18-30815 | 8838 |
| 26. | Columbia Rehabilitation and Healthcare Center, LLC | 18-30795 | 6772 |
| 27. | Comfort RE, LLC | 18-30764 | 1902 |
| 28. | Connorsville RE, LLC | 18-30833 | 9824 |
| 29. | Corinth RE, LLC | 18-30814 | 1777 |
| 30. | Cornerstone Rehabilitation and Healthcare Center, LLC | 18-30800 | 8841 |
| 31. | Crystal Rehabilitation and Healthcare Center, LLC | 18-30807 | 8842 |
| 32. | Delta Rehabilitation and Healthcare Center of Cleveland, LLC | 18-30792 | 7212 |
| 33. | Descending Dove, LLC | 18-30842 | 8081 |
| 34. | Diboll RE, LLC | 18-30766 | 1939 |
| 35. | Easley RE II, LLC | 18-30857 | 1819 |
| 36. | Easley RE, LLC | 18-30854 | 1817 |
| 37. | Edgefield RE, LLC | 18-30836 | 3574 |
| 38. | Farmville RE, LLC | 18-30831 | 3442 |
| 39. | Farmville Rehabilitation and Healthcare Center, LLC | 18-30804 | 4464 |
| 40. | Fleetwood Rehabilitation and Healthcare Center, LLC | 18-30888 | 9615 |
| 41. | Fortress Health & Rehab of Rock Prairie, LLC | 18-30765 | 1314 |
| 42. | Granbury RE, LLC | 18-30769 | 1999 |
| 43. | Great Oaks RE, LLC | 18-30819 | 1731 |
| 44. | Great Oaks Rehabilitation and Healthcare Center, LLC | 18-30780 | 4357 |
| 45. | Greenville RE II, LLC | 18-30846 | 1798 |

| | Debtor Name | Case No. | EIN |
|-----|---|-----------------|------------|
| 46. | Greenville RE, LLC | 18-30843 | 1797 |
| 47. | Greenville Rehabilitation and Healthcare Center, LLC | 18-30882 | 3920 |
| 48. | Greenwood RE, LLC | 18-30816 | 1654 |
| 49. | Greer RE, LLC | 18-30839 | 1795 |
| 50. | Greer Rehabilitation and Healthcare Center, LLC | 18-30859 | 9462 |
| 51. | Grenada RE, LLC | 18-30821 | 1623 |
| 52. | Grenada Rehabilitation and Healthcare Center, LLC | 18-30786 | 8843 |
| 53. | Heritage Park Rehabilitation and Healthcare Center, LLC | 18-30787 | 9055 |
| 54. | Hillsville RE, LLC | 18-30834 | 2195 |
| 55. | Hillsville Rehabilitation and Healthcare Center, LLC | 18-30808 | 4463 |
| 56. | Holly Lane Rehabilitation and Healthcare Center, LLC | 18-30797 | 9103 |
| 57. | Holly RE, LLC | 18-30830 | 1816 |
| 58. | Holly Springs RE, LLC | 18-30823 | 1559 |
| 59. | Holly Springs Rehabilitation and Healthcare Center, LLC | 18-30789 | 6524 |
| 60. | Indianola RE, LLC | 18-30822 | 6022 |
| 61. | Indianola Rehabilitation and Healthcare Center, LLC | 18-30779 | 7203 |
| 62. | Italy RE, LLC | 18-30761 | 2086 |
| 63. | Iva RE, LLC | 18-30852 | 1801 |
| 64. | Iva Rehabilitation and Healthcare Center, LLC | 18-30874 | 0384 |
| 65. | Johns Island Rehabilitation and Healthcare Center, LLC | 18-30891 | 4898 |
| 66. | Joy of Bryan, LLC | 18-30837 | 4072 |
| 67. | Lampstand Health & Rehab of Bryan, LLC | 18-30767 | 2002 |
| 68. | Linley Park Rehabilitation and Healthcare Center, LLC | 18-30890 | 0525 |
| 69. | Macon Rehabilitation and Healthcare Center, LLC | 18-30880 | 9644 |
| 70. | Magnified Health & Rehab of Anderson, LLC | 18-30773 | 9060 |
| 71. | Manna Rehabilitation and Healthcare Center, LLC | 18-30863 | 9441 |
| 72. | Marietta RE, LLC | 18-30867 | 1809 |
| 73. | McCormick RE, LLC | 18-30864 | 1808 |
| 74. | McCormick Rehabilitation and Healthcare Center, LLC | 18-30873 | 3193 |
| 75. | Memphis RE, LLC | 18-30844 | 8846 |
| 76. | Midland RE, LLC | 18-30832 | 5138 |
| 77. | Midland Rehabilitation and Healthcare Center, LLC | 18-30799 | 9679 |
| 78. | Moultrie RE, LLC | 18-30848 | 9943 |
| 79. | Mountain View Rehabilitation and Healthcare Center, LLC | 18-30798 | 9227 |
| 80. | Natchez RE, LLC | 18-30818 | 6019 |
| 81. | Natchez Rehabilitation and Healthcare Center, LLC | 18-30803 | 6773 |
| 82. | New Ark Master Tenant, LLC | 18-30885 | 7893 |
| 83. | New Ark Operator Holdings, LLC | 18-30893 | 7623 |
| 84. | New Redeemer Health & Rehab of Pickens, LLC | 18-30881 | 5321 |
| 85. | Olive Leaf Holding Company, LLC | 18-30845 | 0129 |
| 86. | Olive Leaf, LLC | 18-30866 | 0001 |
| 87. | Omega Health & Rehab of Greenville, LLC | 18-30870 | 9461 |
| 88. | Orianna Health Systems, LLC | 18-30785 | 5160 |
| 89. | Orianna Holding Company, LLC | 18-30784 | 1323 |
| 90. | Orianna Investment, Inc. | 18-30781 | 1141 |
| 91. | Orianna SC Operator Holdings, Inc. | 18-30871 | 0383 |
| 92. | Palladium Hospice and Palliative Care, LLC | 18-30887 | 1873 |
| 93. | Patewood Rehabilitation and Healthcare Center, LLC | 18-30865 | 9457 |
| 94. | Picayune RE, LLC | 18-30827 | 9749 |
| 95. | Picayune Rehabilitation and Healthcare Center, LLC | 18-30793 | 9183 |
| 96. | Pickens RE II, LLC | 18-30862 | 1823 |

| | Debtor Name | Case No. | EIN |
|------|---|-----------------|------------|
| 97. | Pickens RE, LLC | 18-30860 | 1821 |
| 98. | Piedmont RE, LLC | 18-30849 | 1800 |
| 99. | Poinsett Rehabilitation and Healthcare Center, LLC | 18-30876 | 0713 |
| 100. | Poplar Oaks Rehabilitation and Healthcare Center, LLC | 18-30813 | 4771 |
| 101. | Portland RE, LLC | 18-30826 | 1822 |
| 102. | Provo RE, LLC | 18-30835 | 3568 |
| 103. | Rainbow Rehabilitation and Healthcare Center, LLC | 18-30802 | 4772 |
| 104. | River Falls Rehabilitation and Healthcare Center, LLC | 18-30886 | 9788 |
| 105. | Riverside Rehabilitation and Healthcare Center, LLC | 18-30883 | 3951 |
| 106. | Rock Prairie RE, LLC | 18-30772 | 3636 |
| 107. | Rocky Mount RE, LLC | 18-30838 | 5904 |
| 108. | Rocky Mount Rehabilitation and Healthcare Center, LLC | 18-30810 | 4466 |
| 109. | Roy RE, LLC | 18-30817 | 5142 |
| 110. | Scepter Rehabilitation and Healthcare Center, LLC | 18-30872 | 1630 |
| 111. | Scepter Senior Living Center, LLC | 18-30875 | 1621 |
| 112. | Simpsonville RE II, LLC | 18-30858 | 1804 |
| 113. | Simpsonville RE, LLC | 18-30855 | 1802 |
| 114. | Simpsonville Rehabilitation and Healthcare Center, LLC | 18-30889 | 3564 |
| 115. | Snellville RE, LLC | 18-30851 | 9933 |
| 116. | Southern Oaks Rehabilitation and Healthcare Center, LLC | 18-30877 | 1141 |
| 117. | The Bluffs Rehabilitation and Healthcare Center, LLC | 18-30796 | 9314 |
| 118. | The Ridge Rehabilitation and Healthcare Center, LLC | 18-30892 | 1456 |
| 119. | Trinity Mission Health & Rehab of Connersville, LLC | 18-30805 | 8787 |
| 120. | Trinity Mission of Burleson, LLC | 18-30762 | 2585 |
| 121. | Trinity Mission of Comfort, LLC | 18-30763 | 2573 |
| 122. | Trinity Mission of Diboll, LLC | 18-30768 | 2581 |
| 123. | Trinity Mission of Granbury, LLC | 18-30771 | 2582 |
| 124. | Trinity Mission of Italy, LLC | 18-30760 | 2576 |
| 125. | Trinity Mission of Winnsboro, LLC | 18-30776 | 2583 |
| 126. | Utah Valley Rehabilitation and Healthcare Center, LLC | 18-30782 | 9661 |
| 127. | Vicksburg RE, LLC | 18-30828 | 0150 |
| 128. | Victory Rehabilitation and Healthcare Center, LLC | 18-30794 | 9485 |
| 129. | Wadesboro RE, LLC | 18-30853 | 9929 |
| 130. | Wide Horizons RE, LLC | 18-30820 | 5144 |
| 131. | Wide Horizons Residential Care Facility, LLC | 18-30790 | 9387 |
| 132. | Winnsboro RE, LLC | 18-30770 | 2134 |
| 133. | Woodlands Rehabilitation and Healthcare Center, LLC | 18-30791 | 9127 |
| 134. | Yazoo City RE, LLC | 18-30824 | 8844 |
| 135. | Yazoo City Rehabilitation and Healthcare Center, LLC | 18-30783 | 7216 |

Exhibit B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|------------------------|
| In re: | § | |
| | § | |
| | § | Chapter 11 |
| | § | |
| 4 West Holdings, Inc. <i>et al.</i> , ¹ | § | Case No. 18-30777 |
| | § | |
| Debtors. | § | (Jointly Administered) |
| | § | |
| | § | |

**ORDER GRANTING MOTION OF THE DEBTORS FOR ENTRY OF
AN ORDER (I) DIRECTING JOINT ADMINISTRATION OF THEIR
CHAPTER 11 CASES AND (II) GRANTING RELATED RELIEF**

Upon the motion (the “Motion”)² of the above-captioned debtors (the “Debtors”) for entry of an order (this “Order”), under Rules 1005, 1015(b), and 2002(n) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 1015-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), (a) directing the procedural consolidation and joint administration of the Debtors’ Chapter 11 Cases and (b) granting certain related relief, all as further described in the Motion;

¹ A list of the Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, is attached to the Motion as **Exhibit A**.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Motion.

and upon consideration of the First Day Declaration; and this Court having jurisdiction to consider the Motion and the relief requested therein under 28 U.S.C. §§ 157 and 1334; and this Court having found that this is a core proceeding under 28 U.S.C. § 157(b)(2); and this Court having found that venue of this proceeding and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtors' notice of the Motion and opportunity for a hearing were adequate and appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Motion and this Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and this Court having found and determined that the relief sought in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is hereby granted, as set forth herein.
2. The above-captioned Chapter 11 cases shall be consolidated for procedural purposes only and shall be administered jointly under Case No. 18-30777 in accordance with the provisions of Bankruptcy Rule 1015 and Local Rule 1015-1.
3. Parties in interest are directed to use the Proposed Caption, annexed hereto as **Exhibit 1**, which satisfies the requirements of section 342(c) of the Bankruptcy Code, when filing a pleading with the Court in the Debtors' Chapter 11 Cases, indicating that the pleading relates to the jointly administered Chapter 11 Cases of "In re: 4 West Holdings, Inc., *et al.*".
4. A docket entry shall be made on the docket in the chapter 11 case of each other Debtor entity substantially stating as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 11 Cases of 4 West Holdings, Inc. *et al.* The docket in Case No. 18-30777 should be consulted for all matters affecting this case.

5. The Debtors, through their court approved claims and noticing agent, shall maintain separate claims registers and shall file separate schedules and statement of financial affairs for each Debtor.

6. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effectuating a substantive consolidation of the Debtors or their estates.

7. The Debtors are authorized to take all actions they deem necessary to effectuate the relief granted under this Order in accordance with the Motion.

8. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

9. This Court shall retain jurisdiction over any and all matters arising from the interpretation, implementation, or enforcement of this Order.

End of Order

Order submitted by:

DLA PIPER LLP (US)

/s/ Andrew Zollinger

Andrew Zollinger, State Bar No. 24063944

DLA Piper LLP (US)

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-and-

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Dienna Corrado (*pro hac vice admission pending*)

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Email: daniel.simon@dlapiper.com

Proposed Counsel for the Debtors

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|------------------------|
| In re: | § | |
| | § | |
| | § | Chapter 11 |
| | § | |
| 4 West Holdings, Inc. <i>et al.</i> , ¹ | § | Case No. 18-30777 |
| | § | |
| Debtors. | § | (Jointly Administered) |
| | § | |
| | § | |

¹ A list of the Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, is attached hereto as **Exhibit A**.

EXHIBIT A**(Sorted Alphabetically)**

| | Debtor Name | Case No. | EIN |
|-----|--|-----------------|------------|
| 1. | 4 West Holdings, Inc. | 18-30777 | 9732 |
| 2. | 4 West Investors, LLC | 18-30778 | 6021 |
| 3. | Aiken RE, LLC | 18-30850 | 1814 |
| 4. | Ambassador Rehabilitation and Healthcare Center, LLC | 18-30879 | 1636 |
| 5. | Anchor Rehabilitation and Healthcare Center of Aiken, LLC | 18-30868 | 9448 |
| 6. | Anderson RE TX, LLC | 18-30774 | 3630 |
| 7. | Anderson RE, LLC | 18-30861 | 1806 |
| 8. | Ark II Real Estate, LLC | 18-30840 | 3628 |
| 9. | Ark III Real Estate, LLC | 18-30847 | 0121 |
| 10. | Ark Mississippi Holding Company, LLC | 18-30788 | 3765 |
| 11. | Ark Real Estate, LLC | 18-30809 | 6014 |
| 12. | Ark South Carolina Holding Company, LLC | 18-30856 | 0002 |
| 13. | Ark Texas Holding Company, LLC | 18-30806 | 3739 |
| 14. | Battle Ground RE, LLC | 18-30825 | 1818 |
| 15. | Brushy Creek Rehabilitation and Healthcare Center, LLC | 18-30884 | 3292 |
| 16. | Bryan RE, LLC | 18-30775 | 3633 |
| 17. | Burleson RE, LLC | 18-30759 | 1777 |
| 18. | Capstone Rehabilitation and Healthcare Center, LLC | 18-30878 | 7871 |
| 19. | Charlottesville Pointe Rehabilitation and Healthcare Center, LLC | 18-30801 | 4467 |
| 20. | Charlottesville RE, LLC | 18-30829 | 0836 |
| 21. | Cleveland RE, LLC | 18-30811 | 6013 |
| 22. | Clinton RE, LLC | 18-30812 | 8109 |
| 23. | Cobblestone Rehabilitation and Healthcare Center, LLC | 18-30869 | 1612 |
| 24. | Collierville RE, LLC | 18-30841 | 8845 |
| 25. | Columbia RE, LLC | 18-30815 | 8838 |
| 26. | Columbia Rehabilitation and Healthcare Center, LLC | 18-30795 | 6772 |
| 27. | Comfort RE, LLC | 18-30764 | 1902 |
| 28. | Connorsville RE, LLC | 18-30833 | 9824 |
| 29. | Corinth RE, LLC | 18-30814 | 1777 |
| 30. | Cornerstone Rehabilitation and Healthcare Center, LLC | 18-30800 | 8841 |
| 31. | Crystal Rehabilitation and Healthcare Center, LLC | 18-30807 | 8842 |
| 32. | Delta Rehabilitation and Healthcare Center of Cleveland, LLC | 18-30792 | 7212 |
| 33. | Descending Dove, LLC | 18-30842 | 8081 |
| 34. | Diboll RE, LLC | 18-30766 | 1939 |
| 35. | Easley RE II, LLC | 18-30857 | 1819 |
| 36. | Easley RE, LLC | 18-30854 | 1817 |
| 37. | Edgefield RE, LLC | 18-30836 | 3574 |
| 38. | Farmville RE, LLC | 18-30831 | 3442 |
| 39. | Farmville Rehabilitation and Healthcare Center, LLC | 18-30804 | 4464 |
| 40. | Fleetwood Rehabilitation and Healthcare Center, LLC | 18-30888 | 9615 |
| 41. | Fortress Health & Rehab of Rock Prairie, LLC | 18-30765 | 1314 |
| 42. | Granbury RE, LLC | 18-30769 | 1999 |
| 43. | Great Oaks RE, LLC | 18-30819 | 1731 |
| 44. | Great Oaks Rehabilitation and Healthcare Center, LLC | 18-30780 | 4357 |
| 45. | Greenville RE II, LLC | 18-30846 | 1798 |

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| 46. | Greenville RE, LLC | 18-30843 | 1797 |
| 47. | Greenville Rehabilitation and Healthcare Center, LLC | 18-30882 | 3920 |
| 48. | Greenwood RE, LLC | 18-30816 | 1654 |
| 49. | Greer RE, LLC | 18-30839 | 1795 |
| 50. | Greer Rehabilitation and Healthcare Center, LLC | 18-30859 | 9462 |
| 51. | Grenada RE, LLC | 18-30821 | 1623 |
| 52. | Grenada Rehabilitation and Healthcare Center, LLC | 18-30786 | 8843 |
| 53. | Heritage Park Rehabilitation and Healthcare Center, LLC | 18-30787 | 9055 |
| 54. | Hillsville RE, LLC | 18-30834 | 2195 |
| 55. | Hillsville Rehabilitation and Healthcare Center, LLC | 18-30808 | 4463 |
| 56. | Holly Lane Rehabilitation and Healthcare Center, LLC | 18-30797 | 9103 |
| 57. | Holly RE, LLC | 18-30830 | 1816 |
| 58. | Holly Springs RE, LLC | 18-30823 | 1559 |
| 59. | Holly Springs Rehabilitation and Healthcare Center, LLC | 18-30789 | 6524 |
| 60. | Indianola RE, LLC | 18-30822 | 6022 |
| 61. | Indianola Rehabilitation and Healthcare Center, LLC | 18-30779 | 7203 |
| 62. | Italy RE, LLC | 18-30761 | 2086 |
| 63. | Iva RE, LLC | 18-30852 | 1801 |
| 64. | Iva Rehabilitation and Healthcare Center, LLC | 18-30874 | 0384 |
| 65. | Johns Island Rehabilitation and Healthcare Center, LLC | 18-30891 | 4898 |
| 66. | Joy of Bryan, LLC | 18-30837 | 4072 |
| 67. | Lampstand Health & Rehab of Bryan, LLC | 18-30767 | 2002 |
| 68. | Linley Park Rehabilitation and Healthcare Center, LLC | 18-30890 | 0525 |
| 69. | Macon Rehabilitation and Healthcare Center, LLC | 18-30880 | 9644 |
| 70. | Magnified Health & Rehab of Anderson, LLC | 18-30773 | 9060 |
| 71. | Manna Rehabilitation and Healthcare Center, LLC | 18-30863 | 9441 |
| 72. | Marietta RE, LLC | 18-30867 | 1809 |
| 73. | McCormick RE, LLC | 18-30864 | 1808 |
| 74. | McCormick Rehabilitation and Healthcare Center, LLC | 18-30873 | 3193 |
| 75. | Memphis RE, LLC | 18-30844 | 8846 |
| 76. | Midland RE, LLC | 18-30832 | 5138 |
| 77. | Midland Rehabilitation and Healthcare Center, LLC | 18-30799 | 9679 |
| 78. | Moultrie RE, LLC | 18-30848 | 9943 |
| 79. | Mountain View Rehabilitation and Healthcare Center, LLC | 18-30798 | 9227 |
| 80. | Natchez RE, LLC | 18-30818 | 6019 |
| 81. | Natchez Rehabilitation and Healthcare Center, LLC | 18-30803 | 6773 |
| 82. | New Ark Master Tenant, LLC | 18-30885 | 7893 |
| 83. | New Ark Operator Holdings, LLC | 18-30893 | 7623 |
| 84. | New Redeemer Health & Rehab of Pickens, LLC | 18-30881 | 5321 |
| 85. | Olive Leaf Holding Company, LLC | 18-30845 | 0129 |
| 86. | Olive Leaf, LLC | 18-30866 | 0001 |
| 87. | Omega Health & Rehab of Greenville, LLC | 18-30870 | 9461 |
| 88. | Orianna Health Systems, LLC | 18-30785 | 5160 |
| 89. | Orianna Holding Company, LLC | 18-30784 | 1323 |
| 90. | Orianna Investment, Inc. | 18-30781 | 1141 |
| 91. | Orianna SC Operator Holdings, Inc. | 18-30871 | 0383 |
| 92. | Palladium Hospice and Palliative Care, LLC | 18-30887 | 1873 |
| 93. | Patewood Rehabilitation and Healthcare Center, LLC | 18-30865 | 9457 |
| 94. | Picayune RE, LLC | 18-30827 | 9749 |
| 95. | Picayune Rehabilitation and Healthcare Center, LLC | 18-30793 | 9183 |
| 96. | Pickens RE II, LLC | 18-30862 | 1823 |

| | Debtor Name | Case No. | EIN |
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| 97. | Pickens RE, LLC | 18-30860 | 1821 |
| 98. | Piedmont RE, LLC | 18-30849 | 1800 |
| 99. | Poinsett Rehabilitation and Healthcare Center, LLC | 18-30876 | 0713 |
| 100. | Poplar Oaks Rehabilitation and Healthcare Center, LLC | 18-30813 | 4771 |
| 101. | Portland RE, LLC | 18-30826 | 1822 |
| 102. | Provo RE, LLC | 18-30835 | 3568 |
| 103. | Rainbow Rehabilitation and Healthcare Center, LLC | 18-30802 | 4772 |
| 104. | River Falls Rehabilitation and Healthcare Center, LLC | 18-30886 | 9788 |
| 105. | Riverside Rehabilitation and Healthcare Center, LLC | 18-30883 | 3951 |
| 106. | Rock Prairie RE, LLC | 18-30772 | 3636 |
| 107. | Rocky Mount RE, LLC | 18-30838 | 5904 |
| 108. | Rocky Mount Rehabilitation and Healthcare Center, LLC | 18-30810 | 4466 |
| 109. | Roy RE, LLC | 18-30817 | 5142 |
| 110. | Scepter Rehabilitation and Healthcare Center, LLC | 18-30872 | 1630 |
| 111. | Scepter Senior Living Center, LLC | 18-30875 | 1621 |
| 112. | Simpsonville RE II, LLC | 18-30858 | 1804 |
| 113. | Simpsonville RE, LLC | 18-30855 | 1802 |
| 114. | Simpsonville Rehabilitation and Healthcare Center, LLC | 18-30889 | 3564 |
| 115. | Snellville RE, LLC | 18-30851 | 9933 |
| 116. | Southern Oaks Rehabilitation and Healthcare Center, LLC | 18-30877 | 1141 |
| 117. | The Bluffs Rehabilitation and Healthcare Center, LLC | 18-30796 | 9314 |
| 118. | The Ridge Rehabilitation and Healthcare Center, LLC | 18-30892 | 1456 |
| 119. | Trinity Mission Health & Rehab of Connersville, LLC | 18-30805 | 8787 |
| 120. | Trinity Mission of Burleson, LLC | 18-30762 | 2585 |
| 121. | Trinity Mission of Comfort, LLC | 18-30763 | 2573 |
| 122. | Trinity Mission of Diboll, LLC | 18-30768 | 2581 |
| 123. | Trinity Mission of Granbury, LLC | 18-30771 | 2582 |
| 124. | Trinity Mission of Italy, LLC | 18-30760 | 2576 |
| 125. | Trinity Mission of Winnsboro, LLC | 18-30776 | 2583 |
| 126. | Utah Valley Rehabilitation and Healthcare Center, LLC | 18-30782 | 9661 |
| 127. | Vicksburg RE, LLC | 18-30828 | 0150 |
| 128. | Victory Rehabilitation and Healthcare Center, LLC | 18-30794 | 9485 |
| 129. | Wadesboro RE, LLC | 18-30853 | 9929 |
| 130. | Wide Horizons RE, LLC | 18-30820 | 5144 |
| 131. | Wide Horizons Residential Care Facility, LLC | 18-30790 | 9387 |
| 132. | Winnsboro RE, LLC | 18-30770 | 2134 |
| 133. | Woodlands Rehabilitation and Healthcare Center, LLC | 18-30791 | 9127 |
| 134. | Yazoo City RE, LLC | 18-30824 | 8844 |
| 135. | Yazoo City Rehabilitation and Healthcare Center, LLC | 18-30783 | 7216 |