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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> , <sup>1</sup>	§	Case No. 18-30777
	§	
Debtors.	§	(Joint Administration Requested)
	§	
	§	

**REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN “FIRST DAY” MATTERS**

On March 6, 2018, 4 West Holdings, Inc., and its affiliates in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed petitions for relief under Chapter 11 of the title 11 of the United States Code. Proposed counsel for the Debtors believes that these chapter 11 cases qualify as “Complex Chapter 11 Cases.” The Debtors need emergency consideration of the following initial case matters (check those that apply):

<sup>1</sup> 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.

- Motion of Debtors for Entry of an Order (I) Directing the Joint Administration of Their Chapter 11 Cases and (II) Granting Related Relief
- Motion of the Debtors for Entry of an Order Pursuant to Bankruptcy Rule 1007 Extending the Deadline to File Schedules of Assets and Liabilities and Statements of Financial Affairs
- Motion of the Debtors For Entry of Interim and Final Orders Authorizing (I) Continued Use of Existing Cash Management System, (II) Maintenance of Existing Bank Accounts, and (III) Continued Use of Existing Business Forms, and (IV) Waiver of 11 U.S.C. § 345(b) Deposit and Investment Requirements
- Motion of the Debtors for Entry of Interim and Final Orders Authorizing Debtors to (I) Pay Prepetition Wages, Compensation, and Employee Benefits, (II) Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Granting Related Relief
- MOTION FOR ENTRY OF INTERIM ORDER AUTHORIZING USE OF CASH COLLATERAL
- Debtors' Motion (I) Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 364 Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing, (B) Grant Liens and Superpriority Administrative Expense Status, (C) Use Cash Collateral of Prepetition Secured Parties, and (D) Grant Adequate Protection to Prepetition Secured Parties; (II) Scheduling a Final Hearing Pursuant to Bankruptcy Rules 4001(b) and 4001(c); and (III) Granting Related Relief
- Motion of the Debtors for Entry of Interim and Final Orders (I) Approving Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief
- MOTION TO ESTABLISH INTERIM NOTICE PROCEDURES
- MOTION FOR ORDER APPROVING INTERIM RETENTION OF PROFESSIONALS
- Motion of the Debtors for Entry of Interim and Final Orders Authorizing Debtors to Pay or Honor Prepetition Obligations to Critical Vendors
- OTHERS (LIST):
  - Motion of Debtors for Entry of an Order Authorizing the Filing of a Consolidated Mailing Matrix and Consolidated List of Forty (40) Largest Unsecured Creditors
  - Motion of the Debtors for Entry of an Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Patient Information

- Application of the Debtors for Entry of an Order Authorizing Employment and Retention of Rust Consulting/Omni Bankruptcy as Claims, Noticing, and Administrative Agent, *Nunc Pro Tunc* to the Petition Date
- Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to Pay Certain Prepetition Taxes
- Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Maintain, Administer and Modify Their Refund Programs and Practices, and (II) Honor Obligations Related Thereto

Dated: March 6, 2018  
Dallas, Texas

Respectfully submitted,

**DLA PIPER LLP (US)**

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