HONORABLE MARY JO HESTON

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re PNW HEALTHCARE HOLDINGS, LLC, et al.,[1] Debtors.	No. 19-43754-MJH (Jointly Administered) *EX PARTE* MOTION TO LIMIT NOTICE WITH RESPECT TO FIRST INTERIM APPLICATIONS FOR COMPENSATION

The Official Unsecured Creditors Committee (the "Committee") in the above-captioned jointly administered bankruptcy cases (together, the "Bankruptcy Case"), and the Debtors, together move the Court for an order limiting notice with respect to the first interim fee applications to be filed by the Committee's and the Debtors' professionals and the Court-appointed Patient Care Ombudsman (the

[1] The Debtors in the above-captioned chapter 11 cases are: PNW Healthcare Holdings, LLC, Case No. 19-43754; Aldercrest Health-Edmonds, LLC, Case No. 19-43787; Bremerton Health, LLC, Case No. 19-43788; Care Center East Health-Portland, Case No. 19-43757; Cherrywood Place-Spokane, LLC, Case No. 19-43755; Crestwood Convalescent-Port Angeles, LLC, Case No. 19-43789; Fir Lane Health-Shelton, LLC, Case No. 19-43756; Forest Ridge Health-Bremerton, LLC, Case No. 19-43790; Franklin Hills Health-Spokane, LLC, Case No. 19-43758; Gardens on University-Spokane Valley, LLC, Case No. 19-43759; Ivy Court-Coeur d'Alene, LLC, Case No. 19-43760; LaCrosse Health Coeur d'Alene, LLC, Case No. 19-43761; Meadow Park Health-St. Helen, LLC, Case No. 19-43762; North Auburn Health, LLC, Case No. 19-43791; PNW Master Tenant I, LLC, Case No. 19-43763; PNW Master Tenant II, LLC, Case No. 19-43764; Puget Sound Healthcare-Olympia, LLC, Case No. 19-43765; Riverside Nursing-Centralia, LLC, Case No. 19-43766; and Sequim Health, LLC, Case No. 19-43792, Cornerstone Healthcare Services, Case No. 20-40156 and CRN Pool LLC, Case No. 20-40157.

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"Ombudsman"). This Motion is based upon the files and records herein and the accompanying Declaration of Shane Moses.

The Debtors filed their Chapter 11 bankruptcy cases on November 22, 2019. Moses Decl. The combined mailing matrix with respect to the Bankruptcy Case consists of 2,200 entities and individuals. *Id.* While the Debtors obtained an order limiting the notices to be provided to employees and have sought and obtained authority to limit notice as to other specific matters, the Debtors have not yet sought or obtained a case management order limiting notices generally. *Id.*

Pursuant to the Order Establishing Procedures for Interim Compensation to Professionals (the "Interim Payment Procedures Order") (Docket No. 241), the Debtors' and Committee's professionals have sent their monthly invoices to each other's counsel and counsel for MidCap Funding IV Trust ("MidCap"); Ziegler Financing Corporation ("Ziegler"); and the United States Trustee ("UST") (the "Notice Parties"). Moses Decl. The Notice Parties have not objected to payment of 80% fees and 100% of costs pursuant to the Interim Payment Procedures Order. *Id.*

The applications for compensation to be filed are interim in nature and will remain subject to final approval. Moses Decl.

Under the circumstances, and in order to avoid the costly exercise of mailing the notices associated with the first interim fee applications to the entire matrix, the Committee and the Debtors respectfully request the Court limit the notice required to be given with respect to the first interim fee applications to the following:

(a) the Debtors and their counsel (in the case of Committee professionals and the Ombudsman)

(b) the Committee and its counsel (in the case of the Debtors' professionals and the Ombudsman)

(c) counsel for MidCap;

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(d) counsel for Ziegler;

(e) the Ombudsman (in the case of the Debtors' and the Committee's Professionals.

(f) the United States Attorney's Office;

(g) the Office of the UST;

(h) Washington State Attorney General, Bankruptcy & Collections Unit;

(i) the largest 20 unsecured creditors of Debtors, on a consolidated basis; and

(j) parties who have filed a request for Special Notice.

DATED this 7th day of May, 2020.

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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re PNW HEALTHCARE HOLDINGS, LLC, et al.,[1] Debtors.	No. 19-43754-MJH (Jointly Administered) [PROPOSED] ORDER LIMITING NOTICE WITH RESPECT TO FIRST INTERIM APPLICATIONS FOR COMPENSATION

This matter came before the Court upon the *ex parte* Motion to Limit Notice with Respect to First Interim Applications for Compensation jointly filed by the Debtors, debtors-in-possession in the above-captioned jointly administered bankruptcy cases, and the Official Unsecured Creditors

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Committee. Capitalized terms herein have the meaning set forth in the Motion unless otherwise indicated. The Court has reviewed the files and records herein and finds that cause exists for the requested relief. Now, therefore, it is hereby

ORDERED:

1. The Motion is granted;

2. Notice of the first interim fee applications to be filed by the professionals for the Debtors and the Committee, as well as for the Ombudsman, is limited to the following entities:

(a) the Debtors and their counsel (in the case of Committee professionals and the Ombudsman)

(b) the Committee and its counsel (in the case of the Debtors' professionals and the Ombudsman)

(c) counsel for MidCap Funding IV Trust;

(d) counsel for Ziegler Financing Corporation;

(e) the Ombudsman (in the case of the Debtors' and the Committee's Professionals.

(f) the United States Attorney's Office;

(g) the Office of the Unites States Trustee;

(h) Washington State Attorney General, Bankruptcy & Collections Unit;

(i) the largest 20 unsecured creditors of Debtors on a consolidated basis; and

(j) parties who have filed a request for Special Notice.

//End of Order//

Presented by:

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