

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

In re:	)	
	)	Chapter 11
OCONEE REGIONAL HEALTH SYSTEMS, INC., <i>et al.</i> , <sup>1</sup>	)	PROPOSED Jointly
	)	Administered Under
Debtors.	)	Case No. 17-51005
	)	

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**DEBTORS’ MOTION TO SET A BAR DATE FOR THE FILING  
OF PREPETITION PROOFS OF CLAIM**

Oconee Regional Health Systems, Inc., Oconee Regional Medical Center, Inc., Oconee Regional Health Services, Inc., Oconee Regional Emergency Medical Services, Inc., Oconee Regional Health Ventures, Inc. (sometimes d/b/a Oconee Neurology Services), Oconee Internal Medicine, LLC, Oconee Orthopedics, LLC, ORHV Sandersville Family Practice, LLC, and Oconee Regional Senior Living, Inc. (collectively, the “*Debtors*”) file this motion (the “*Motion*”) for an order, substantially in the form attached hereto, setting a bar date for the filing of all prepetition proofs of claim.

The Debtors are seeking an expedited hearing and emergency relief on this Motion, but this is procedural in nature only. No substantive rights are being affected by the Motion – only a deadline is being set as is customary in all Chapter 11 cases. Further information supporting the expedited relief on this and certain other “first day” motions can be found in the Debtors’ Motion

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<sup>1</sup> The last four digits of the employer identification number for each of the Debtors follow in parenthesis: (i) Oconee Regional Health Systems, Inc. (9394), (ii) Oconee Regional Medical Center, Inc. (9398), (iii) Oconee Regional Health Services, Inc. (9397), (iv) Oconee Regional Emergency Medical Services, Inc. (3857), (v) Oconee Regional Health Ventures, Inc. (sometimes d/b/a Oconee Neurology Services) (8516), (vi) Oconee Internal Medicine, LLC (1712), (vii) Oconee Orthopedics, LLC (3694), (viii) ORHV Sandersville Family Practice, LLC (1236), and (ix) Oconee Regional Senior Living, Inc. (5613). The Debtors’ corporate mailing address is 821 North Cobb Street, Milledgeville, Georgia, 31061.

for Expedited Hearing and Emergency Interim Relief Pursuant to Local Bankruptcy Rule 2002-1(G).

In support of this Motion, the Debtors respectfully represent as follows:

**Background**

1. On May 10, 2017 (the “*Petition Date*”), the Debtors filed voluntary petitions with the United States Bankruptcy Court for the Middle District of Georgia, Macon Division under Chapter 11 of Title 11 of the United States Code (the “*Bankruptcy Code*”). Since the Petition Date, the Debtors have continued in possession of their properties and have operated and managed their businesses as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2. The Debtor Oconee Regional Health Systems, Inc. (“*ORHS*”) is a not-for-profit healthcare system that, through various affiliates, provides critical medical services to the citizens and communities of central Georgia. ORHS can generally be thought of as three legally separate, but closely affiliated, operations.

3. First, chief among the ORHS structure is the Debtor Oconee Regional Medical Center, Inc. (“*ORMC*”), a not-for-profit hospital located in Milledgeville, Georgia. ORHS owns the equity of ORMC. ORMC provides acute and skilled nursing services through a 140-bed general acute care hospital and 15-bed skilled nursing unit. ORMC is the only general acute-care hospital within a 30-mile radius and is the largest hospital in the ~4,400 square mile area between Macon, Augusta, and Atlanta, Georgia. Over the last twelve (12) months, ORMC had approximately 2,600 inpatient admissions with an average length of stay of 3.9 days, as well as over 33,000 emergency room visits and over 2,100 skilled nursing patient days.

4. Second, the Debtor Oconee Regional Health Ventures, Inc. (“*ORHV*”), a for-profit entity owned by ORHS, operates two wholly-owned clinics and one majority-owned outpatient clinic, all in and around Milledgeville, Georgia. These ORHV subsidiaries are Debtors Oconee Internal Medicine, LLC and Oconee Orthopedics, LLC, and non-Debtor Oconee Sleep & Wellness Center, LLC (which is 71% owned by ORHV). In addition, ORHV has certain operations of its own, as it sometimes does business as Oconee Neurology.

5. Third and finally, ORHS owns the equity of Oconee Regional Healthcare Foundation, Inc. (the “*Foundation*”), a small, non-profit entity that raises money to support certain charitable, educational, and scientific goals and missions of ORHS. The Foundation is not a Debtor.

6. The last four of the Debtors are Oconee Regional Health Services, Inc., Oconee Regional Emergency Medical Services, Inc., Oconee Regional Senior Living, Inc., and ORHV Sandersville Family Practice, LLC, all of which discontinued their operations some time before the Petition Date. These companies have no material assets or liabilities, other than intercompany items or miscellaneous guarantees.

7. A separate non-debtor affiliate, Jasper Health Services, Inc., operates its own 17-bed critical access hospital (Jasper Memorial Hospital) and a 55-bed skilled nursing facility (The Retreat), neither of which operations are debtors in these cases and both of which continue to operate in the ordinary course of their business.

8. Further information about the Debtors and these Chapter 11 cases, a corporate chart showing the structure of the Debtors and non-debtors, and additional facts in support of this Motion can be found in the Declaration of Steven M. Johnson in Support of Chapter 11 Filings and Certain Initial Relief Requested (Doc. No. 2).

9. As of the date hereof, no official committee of unsecured creditors has been appointed in any of these cases, and no request has been made for the appointment of an examiner or trustee.

**Jurisdiction, Venue, and Statutory Predicate**

10. This Court has jurisdiction over these cases pursuant to 28 U.S.C. §§ 157 and 1334. Venue of these cases is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409. This Motion is a core proceeding pursuant to 28 U.S.C. § 157(b).

11. The statutory predicate for the relief requested in this Motion is Section 502 of the Bankruptcy Code.

**Relief Requested**

12. The Debtors are seeking to move quickly through a sale process and this bankruptcy, and it follows that all parties in interest and this Court should know of the components of the creditor body sooner rather than later. The Debtors are not seeking an extension of time to file their schedules of assets and liabilities and statements of financial affairs. Indeed, the Debtors expect to file these early, within ten days of the Petition Date. Thus, creditors will know very early how they are scheduled.

13. The Debtors propose that the final date to file prepetition proofs of claim be **forty-five (45) days after the Petition Date, or June 24, 2017** (the “*Bar Date*”). This would also apply to prepetition “administrative” claims under Section 503(b)(9) of the Bankruptcy Code. But it would not apply to postpetition claims, as the Debtors continue to operate and pay those as they accrue; it would not be meaningful for creditors to file proofs of claim for administrative expenses at this time, while such amounts continue to rise and fall in accordance with normal course operations.

14. The Debtors propose special rules for parties to executory contracts that are later rejected, as by necessity, there must be a rejection order prior to a contract counterparty knowing that it has a rejection claim. Any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease must file a proof of claim based on such rejection on or before the later of the Bar Date or the date that is 30 days after the date of the order authorizing such rejection.

15. Further, if the Debtors amend or supplement their schedules, the Debtors shall give notice of any amendment or supplement to the holders of claims amended thereby, and holders of such claims shall have until the later of the Bar Date or the date that is 30 days from the date of service of the notice to file proofs of claim and shall be given notice of that deadline.

16. Pursuant to the proposed attached Bar Date Order, except as provided therein, any person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, trust and governmental unit) that holds or seeks to assert a prepetition claim shall file a proof of claim that substantially conforms to Official Form 10.

17. The Debtors propose that holders of the following prepetition claims **not** be required to file a proof of claim on or before the Bar Date solely with respect to such claims:

(a) a claim against any of the Debtors for which a signed proof of claim has already been properly filed with the Clerk of the Bankruptcy Court;

(b) a claim that is listed on the Debtors' Schedules, if and only if: (i) such claim is not scheduled as "disputed," "contingent," or "unliquidated" and (ii) the holder of such claim agrees with the amount, nature and priority of the claim as set forth in the Schedules;

(c) any claim that has been paid in full by the Debtors in accordance with the Bankruptcy Code or an order of this Court;

(d) any claims by a current employee of any of the Debtors, if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business as a wage, commission, or benefit, provided that a current employee must submit a proof of claim by the Bar Date for all other claims arising before the Petition Date;

(e) any claim that has been allowed by an order of this Court entered on or before the Bar Date;

(f) any claim for which specific deadlines have been fixed (or not yet been fixed) by an order of this Court entered on or before the Bar Date, it being the intent of the Trustee that such orders of the Court control such claims;

(g) any claim limited to the repayment of principal, interest, applicable fees, premium, if any, costs and/or other charges (a "Debt Claim") on or under any bond or related obligation issued by or for the benefit of the Debtors, or any of them, pursuant to an indenture or related instrument ("Debt Instruments"); provided however that (i) the foregoing exclusion shall not apply to any indenture trustee or master trustee under applicable Debt Instruments ("Indenture Trustees"); (ii) Indenture Trustees shall file such proofs of claim as they shall deem necessary and appropriate in their respective sole discretion on or before the Bar Date with respect to any Debt Claims on or under Debt Instruments; and (iii) any holder of a Debt Claim wishing to assert a claim other than a Debt Claim shall be required to file a proof of claim on or before the Bar Date, unless another exception in this paragraph applies. In addition, with respect to claims filed by any indenture trustee under the applicable indenture, such claimants need not attach copies of the documents evidencing and/or securing the claims;

(h) any Debtor making a claim against another Debtor, if any such claims are to be made; and

(i) any individual holding a prepetition claim on account of any medical, health, or related healthcare services rendered or goods provided by the Debtors.

18. The Debtors propose that, pursuant to Bankruptcy Rule 3003(c)(2), any claimant required to file a proof of claim asserting a prepetition claim in these Chapter 11 cases, that fails to do so properly by the Bar Date or in accordance with such other procedures as are set forth in the Bar Date Order, should be forever barred, estopped, and enjoined from (i) asserting such claim against the Debtors and their estates (or filing a proof of claim with respect thereto), and the Debtors and their properties and estates shall be forever discharged from any and all indebtedness or liability with respect to such claim, and (ii) voting upon, or receiving any distributions under, any chapter 11 plan in these chapter 11 cases or otherwise in respect of or on account of such claim. Such claimant shall not be treated as a creditor with respect to such claim for any purpose in these chapter 11 cases.

**Basis for Relief**

19. Section 501 of the Bankruptcy Code allows a creditor to file a proof of claim. 11 U.S.C. § 501. Section 105(a) of the Bankruptcy Code permits a court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions” of the Bankruptcy Code. 11 U.S.C. § 105(a).

20. Rule 3003(c)(2) of the Federal Rules of Bankruptcy Procedure provides that any creditor who asserts a claim against or an interest in the Debtors that arose, or is deemed to have arisen, prior to their respective petition dates and whose claim or interest is either not listed on the Debtors’ schedules of assets and liabilities (collectively, the “*Schedules*”) or is listed on the Schedules as disputed, contingent, or unliquidated, must file a proof of claim or interest. Fed. R. Bankr. P. 3003(c)(2). Further, Rule 3003(c)(3) states that “the court shall fix . . . the time within which proofs of claim or interest may be filed.” Fed. R. Bankr. P. 3003(c)(3). Taken together, these provisions authorize approval of a deadline to file the proofs of claim discussed herein.

21. Section 105 of the Bankruptcy Code and Rule 9007 permit the Court to approve the proposed procedures for the filing of prepetition claims and to approve the form, manner, and sufficiency of notice of the Bar Date. *See* Fed. R. Bankr. P. 9007 (“When notice is to be given under these rules, the court shall designate, if not otherwise specified herein, the time within which, the entities to whom, and the form and manner in which the notice shall be given.”). The Debtors submit that approval of the proposed procedures, the form, manner, and sufficiency of notice of such procedures, and the Bar Date satisfy this standard. Moreover, establishing the Bar Date is a critical element for the Debtors to proceed with the orderly and efficient administration of the chapter 11 cases. Given the Debtors’ plan to file their schedules within the first ten days of these cases, the proposed bar date is more than a month after the time schedules will be filed.

**No Prior Request**

22. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

**Reservation of Rights**

23. Unless otherwise provided by orders of this Court, the Debtors reserve their rights to object to any proof of claim on any grounds and all rights to dispute, or to assert offsets and defenses to, any claim reflected on the Schedules, or any amendments thereto, as to amount, liability, classification or otherwise, and to subsequently designate any such claim as disputed, contingent, unliquidated or undetermined.

**Notice**

24. Notice of this Motion has been given to the following parties, or to their counsel: (a) the Office of the United States Trustee for the Middle District of Georgia; (b) each of the Debtors' twenty largest unsecured creditors; (c) counsel to U.S. Bank National Association, as Bond Trustee, (d) the office of the Georgia Attorney General; (e) counsel to Prime Healthcare Foundation, Inc., (f) Navicent Health, Inc., (g) counsel to Jasper Health Services, Inc., and (h) all parties that have requested notice in these cases under Bankruptcy Rule 2002.

25. The proposed Order also contemplates that the Debtors will serve a copy of the order, setting the bar date, on all creditors, including a variety of specially listed parties that may have an interest in these cases.

26. In light of the nature of the relief requested, the Debtors respectfully submit that no further notice is necessary.

**Conclusion**

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form attached hereto, granting the relief requested herein and granting the Debtors such other and further relief as the Court deems just and proper.

Dated: May 10, 2017

**BRYAN CAVE LLP**

*/s/ Mark I Duedall*

\_\_\_\_\_  
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*Proposed Counsel for the Debtors and  
Debtors-in-Possession*

**EXHIBIT A**

**PROPOSED ORDER**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
MACON DIVISION**

In re:	)	
	)	Chapter 11
OCONEE REGIONAL HEALTH	)	
SYSTEMS, INC., <i>et al.</i> , <sup>1</sup>	)	Case No. 17-51005
	)	
Debtors.	)	(Jointly Administered)
<hr/>		

**ORDER SETTING FINAL DATE TO FILE PREPETITION PROOFS OF CLAIM**

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<sup>1</sup> The last four digits of the employer identification number for each of the Debtors follow in parenthesis: (i) Oconee Regional Health Systems, Inc. (9394), (ii) Oconee Regional Medical Center, Inc. (9398), (iii) Oconee Regional Health Services, Inc. (9397), (iv) Oconee Regional Emergency Medical Services, Inc. (3857), (v) Oconee Regional Health Ventures, Inc. (sometimes d/b/a Oconee Neurology Services) (8516), (vi) Oconee Internal Medicine, LLC (1712), (vii) Oconee Orthopedics, LLC (3694), (viii) ORHV Sandersville Family Practice, LLC (1236), and (ix) Oconee Regional Senior Living, Inc. (5613). The Debtors' corporate mailing address is 821 North Cobb Street, Milledgeville, Georgia, 31061.

Oconee Regional Health Systems, Inc., Oconee Regional Medical Center, Inc., Oconee Regional Health Services, Inc., Oconee Regional Emergency Medical Services, Inc., Oconee Regional Health Ventures, Inc. (sometimes d/b/a Oconee Neurology Services), Oconee Internal Medicine, LLC, Oconee Orthopedics, LLC, ORHV Sandersville Family Practice, LLC, and Oconee Regional Senior Living, Inc. (collectively, the “*Debtors*”), filed a motion (the “*Motion*,” Doc. No. \_\_\_\_ ) for entry of an order setting a final date to file prepetition proofs of claim..

The Court has jurisdiction to consider the Motion and the relief requested in the Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue of these cases in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409. The Motion and the relief requested in the Motion constitute a core proceeding pursuant to 28 U.S.C. § 157(b).

The Debtors sought an expedited hearing and emergency, interim relief on the Motion. Debtors’ Motion for Expedited Hearing and Emergency Interim Relief Pursuant to Local Bankruptcy Rule 2002-1(G) (Doc. No. \_\_\_\_). In light of the relief requested, this Court granted the request for an expedited hearing, in its Order Granting Debtors’ Motion for Expedited Hearing to Consider Certain Interim, First-Day Relief (Doc. No. \_\_\_\_).

The Court has considered the Motion and the statements and arguments made at a hearing on the Motion. This Court has determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, creditors, and other parties in interest. The Debtors gave due and proper notice of the Motion and the Court has determined that additional or further notice of the Motion is not necessary, except as set forth below. The Court has determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted in this Order, and after due deliberation, and sufficient cause appearing therefor,

**IT IS ORDERED THAT:**

1. The Motion is GRANTED.
2. The deadline to file all prepetition proofs of claim, other than the categories of claims or claimants set forth in paragraphs 4 below, is **June 24, 2017** (the “*Bar Date*”).
3. Except as expressly provided herein, each creditor or party in interest who seeks to pursue a prepetition claim against the Debtors, the Debtors’ property, or their estates **shall file a proof of claim by the Bar Date with:**

Clerk, U.S. Bankruptcy Court  
US Bankruptcy Court for the Middle District of Georgia  
433 Cherry Street - Suite 2  
Macon, GA 31201

Claims filed electronically may be filed up to 11:59:59 p.m. All other claims must be filed by delivery to the Clerk's Office on business days between 8:00 a.m. and 4:00 p.m. All proofs of claim shall substantially conform to Official Form 10.

4. The following prepetition claims are **not** subject to the Bar Date:
  - (a) a claim against any of the Debtors for which a signed proof of claim has already been properly filed with the Clerk of the Bankruptcy Court;
  - (b) a claim that is listed on the Debtors’ Schedules, if and only if: (i) such claim is not scheduled as “disputed,” “contingent,” or “unliquidated” and (ii) the holder of such claim agrees with the amount, nature and priority of the claim as set forth in the Schedules;
  - (c) any claim that has been paid in full by the Debtors in accordance with the Bankruptcy Code or an order of this Court;
  - (d) Any claims by a current employee of any of the Debtors, if an order of this Court authorized the Debtors to honor such claim in the ordinary course of business as a wage, commission, or benefit, provided that a current employee must submit a proof of claim by the Bar Date for all other claims arising before the Petition Date;
  - (e) any claim that has been allowed by an order of this Court entered on or before the Bar Date;

(f) any claim for which specific deadlines have been fixed (or not yet been fixed) by an order of this Court entered on or before the Bar Date, it being the intent of the Trustee that such orders of the Court control such claims;

(g) any claim limited to the repayment of principal, interest, applicable fees, premium, if any, costs and/or other charges (a "Debt Claim") on or under any bond or related obligation issued by or for the benefit of the Debtors, or any of them, pursuant to an indenture or related instrument ("Debt Instruments"); provided however that (i) the foregoing exclusion shall not apply to any indenture trustee or master trustee under applicable Debt Instruments ("Indenture Trustees"); (ii) Indenture Trustees shall file such proofs of claim as they shall deem necessary and appropriate in their respective sole discretion on or before the Bar Date with respect to any Debt Claims on or under Debt Instruments; and (iii) any holder of a Debt Claim wishing to assert a claim other than a Debt Claim shall be required to file a proof of claim on or before the Bar Date, unless another exception in this paragraph applies, In addition, with respect to claims filed by any indenture trustee under the applicable indenture, such claimants need not attach copies of the documents evidencing and/or securing the claims;

(h) any Debtor making a claim against another Debtor, if any such claims are to be made; and

(i) any individual holding a prepetition claim on account of any medical, health, or related healthcare services rendered or goods provided by the Debtors.

5. Any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease must file a proof of claim based on such rejection on or before the later of the Bar Date or the date that is 30 days after the date of the order authorizing such rejection.

6. Should the Debtors amend or supplement their schedules, the Debtors shall give notice of any amendment or supplement to the holders of claims amended thereby, and holders of such claims shall have until the later of the Bar Date or the date that is 30 days from the date of service of the notice to file proofs of claim and shall be given notice of that deadline.

7. Any claimant required to file a proof of claim asserting a prepetition claim in these Chapter 11 cases, that fails to do so properly by the Bar Date or in accordance with such other procedures as are set forth in this Order, should be forever barred, estopped, and enjoined from (i) asserting such claim against the Debtors and their estates (or filing a proof of claim with

respect thereto), and the Debtors and their properties and estates shall be forever discharged from any and all indebtedness or liability with respect to such claim, and (ii) voting upon, or receiving any distributions under, any chapter 11 plan in these chapter 11 cases or otherwise in respect of or on account of such claim. Such claimant shall not be treated as a creditor with respect to such claim for any purpose in these chapter 11 cases..

8. Any party in interest in these cases shall until May 31, 2017 to file a written objection with respect to the Motion or this Order on them, and to serve a copy of the same upon Counsel for the Debtors, counsel to the Bond Trustee, and the Office of the United States Trustee. If any objection is filed, then the Court will convene a hearing to consider such objection. If no objection is timely filed, then this Order will immediately thereafter be deemed a final Order.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or related to the implementation of this Order; and it is further

10. The Debtors are directed, within two business days of the entry of this Order, to serve a copy of this Order upon all the parties which were served with the Motion, along with any parties that have filed notice of appearance in these cases.

11. In addition, without limiting the foregoing, within five days of the entry of this Order, the Debtors are directed to serve a copy of this Order upon (a) all creditors and parties in interest in these cases, (b) the Office of the United States Trustee for the Middle District of Georgia, (c) each Debtors' twenty largest unsecured creditors, (d) counsel for the Stalking Horse Bidder, (e) counsel to the indenture trustee for the Series 1998 Bonds and Series 2016 Bonds, (f) all Persons who have asserted any liens upon any of the Debtors' assets, (g) the Internal Revenue Service and all taxing authorities in each jurisdiction applicable to any Debtor, (h) all

Governmental Units exercising jurisdiction with respect to the Debtors (i) the Department of Health and Human Services and its Centers for Medicare and Medicaid Services, (j) the Office of the Attorney General of the State of Georgia, (k) the landlords for all non-residential real properties occupied by the Debtors as of the Petition Date, (l) counsel for Baldwin County, Georgia, (m) the Authority, (n) Georgia Department of Community Health, Division of Healthcare Facility Regulation, (o) Georgia Department of Community Health, Office of General Counsel, (p) Georgia Department of Community Health, Division of Medical Assistance (Medicaid), (q) Georgia Department of Community Health, Office of Health Planning; (r) Georgia Board of Pharmacy, (s) Centers for Medicare & Medicaid Services, Division of Laboratory Services, Survey and Certification Group, (t) Centers for Medicare & Medicaid Services, Office of Financial Management, (u) Cahaba GBA, (v) City of Milledgeville, Business License division, (w) The Joint Commission (formerly known as JCAHO), (x) United States Department of Justice, Drug Enforcement Administration, (y) Georgia Department of Labor, (z) Georgia Department of Public Health, Food Service Permit division; and (aa) the holders of the Series 1998 Bonds and Series 2016 Bonds (through the Depository Trust Company and the Electronic Municipal Market Access (EMMA) service).

**\*\*\* END OF DOCUMENT \*\*\***

*Prepared and presented by:*

**BRYAN CAVE LLP**

*/s/ Mark I. Duedall*

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*Proposed Counsel for the Debtors and Debtors-in-Possession*

**DISTRIBUTION LIST**

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**CERTIFICATE OF SERVICE**

This is to certify that on the date set forth below, I electronically filed the foregoing as well as a proposed form of order. On the same date, I also caused the parties set forth below to be served with the foregoing by United States First Class mail, postage pre-paid:

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Center of Medicare and Medicaid Service  
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Georgia Power Company  
Attn: Paul Bowers, CEO  
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Healthcare Services Group, Inc.  
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Medline Industries, Inc.  
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Quest Diagnostics Clinical Laboratories  
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Stryker Orthopaedics  
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Varian Oncology Systems  
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Gerald Grimes Plumbing  
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Milledgeville, GA 31061

Healthcare Management Services  
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425 North Cobb Street  
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EnduraCare AcuteCare  
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381 Riverside Drive – Suite 400  
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This 10th day of May, 2017.

**BRYAN CAVE LLP**

/s/ Leah Fiorenza McNeill

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in-Possession*