

Prime Clerk 

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Case Name: ***Promise Healthcare Group, LLC (18-12491)***

Important Legal Document

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Notice of Filing of Bankruptcy Petitions and Related Pleadings; Notice and Agenda of Hearing on First Day Motions Scheduled for November 6, 2018 at 4:00 p.m. (ET) (Related Documents: 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18) [Docket No. 24]

Further information regarding these cases, including all court documents, is available free of charge at <https://cases.primeclerk.com/promisehealthcaregroup/>

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SRF 28743

**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.*,<sup>1</sup> : Case No. 18-12491 (CSS)
  
:
  
Debtors. : (Joint Administration Requested)
  
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**NOTICE OF FILING OF BANKRUPTCY PETITIONS AND RELATED PLEADINGS; NOTICE AND AGENDA OF HEARING ON FIRST DAY MOTIONS SCHEDULED FOR NOVEMBER 6, 2018 AT 4:00 P.M. (ET)**<sup>23</sup>

**PLEASE TAKE NOTICE** that, on November 5, 2018, the above-captioned debtors and debtors in possession (the “Debtors”) filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, as set forth below:

<sup>1</sup> 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), Professional Rehabilitation Hospital, L.L.C. (5340), 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), St. Alexius Hospital Corporation #1 (2766), St. Alexius Properties, LLC (4610), Success Healthcare 1, LLC (6535), Success Healthcare 2, LLC (8861), 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, 3<sup>rd</sup> FL, Boca Raton, FL 33431.

<sup>2</sup> Copies of all petitions, motions and pleadings identified herein may be obtained through the website of the Debtors’ proposed claims agent at <https://cases.primeclerk.com/promisehealthcaregroup/>.

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

A. Voluntary Petitions

1. Promise Healthcare Group, LLC - [D.I. 1, Case No. 18-12491];
2. Promise Healthcare Holdings, Inc. - [D.I. 1, Case No. 18-12494];
3. Promise Healthcare, Inc. - [D.I. 1, Case No. 18-12499];
4. Promise Healthcare #2, Inc. - [D.I. 1, Case No. 18-12502];
5. Promise Hospital of Dallas, Inc. - [D.I. 1, Case No. 18-12505];
6. Promise Hospital of Overland Park, Inc. - [D.I. 1, Case No. 18-12506];
7. Promise Hospital of Wichita Falls, Inc. - [D.I. 1, Case No. 18-12507];
8. Promise Skilled Nursing Facility of Overland Park, Inc. - [D.I. 1, Case No. 18-12508];
9. Promise Skilled Nursing Facility of Wichita Falls, Inc. - [D.I. 1, Case No. 18-12509];
10. Promise Hospital of Phoenix, Inc. - [D.I. 1, Case No. 18-12510];
11. Promise Hospital of Ascension, Inc. - [D.I. 1, Case No. 18-12511];
12. Promise Hospital of Baton Rouge, Inc. - [D.I. 1, Case No. 18-12512];
13. Promise Hospital of Louisiana, Inc. - [D.I. 1, Case No. 18-12513];
14. Professional Rehabilitation Hospital, L.L.C. - [D.I. 1, Case No. 18-12514];
15. Promise Hospital of Salt Lake, Inc. - [D.I. 1, Case No. 18-12515];
16. Promise Hospital of Vicksburg, Inc. - [D.I. 1, Case No. 18-12516];
17. HLP of Shreveport, Inc. - [D.I. 1, Case No. 18-12517];
18. Bossier Land Acquisition Corp. - [D.I. 1, Case No. 18-12518];
19. Promise Hospital of Florida at The Villages, Inc. - [D.I. 1, Case No. 18-12519];
20. Promise Hospital of Dade, Inc. - [D.I. 1, Case No. 18-12520];
21. Promise Hospital of Lee, Inc. - [D.I. 1, Case No. 18-12521];
22. Promise Properties of Dade, Inc. - [D.I. 1, Case No. 18-12522];

23. Promise Properties of Lee, Inc. - [D.I. 1, Case No. 18-12523];
24. Promise Properties of Shreveport, LLC - [D.I. 1, Case No. 18-12492];
25. HLP HealthCare, Inc. - [D.I. 1, Case No. 18-12493];
26. Quantum Health, Inc. - [D.I. 1, Case No. 18-12495];
27. HLP Properties, Inc. - [D.I. 1, Case No. 18-12496];
28. Quantum Properties, L.P. - [D.I. 1, Case No. 18-12497];
29. Promise Healthcare of California, Inc. - [D.I. 1, Case No. 18-12498];
30. PH-ELA, Inc. - [D.I. 1, Case No. 18-12500];
31. Promise Hospital of East Los Angeles, L.P. - [D.I. 1, Case No. 18-12501];
32. Success Healthcare, LLC - [D.I. 1, Case No. 18-12503];
33. HLP of Los Angeles, LLC - [D.I. 1, Case No. 18-12504];
34. Success Healthcare 1, LLC - [D.I. 1, Case No. 18-12524];
35. Success Healthcare 2, LLC - [D.I. 1, Case No. 18-12525];
36. St. Alexius Hospital Corporation #1 - [D.I. 1, Case No. 18-12526];
37. St. Alexius Properties, LLC - [D.I. 1, Case No. 18-12527];
38. LH Acquisition, LLC - [D.I. 1, Case No. 18-12528];
39. HLP Properties of Vidalia, LLC - [D.I. 1, Case No. 18-12529];
40. Vidalia Real Estate Partners, LLC - [D.I. 1, Case No. 18-12530];
41. HLP Properties at the Villages Holdings, LLC - [D.I. 1, Case No. 18-12531];
42. HLP Properties at the Villages, L.L.C. - [D.I. 1, Case No. 18-12532];
43. Promise Behavioral Health Hospital of Shreveport, Inc. - [D.I. 1, Case No. 18-12533];
44. Promise Rejuvenation Centers, Inc. - [D.I. 1, Case No. 18-12534];
45. Promise Rejuvenation Center at the Villages, Inc. - [D.I. 1, Case No. 18-12535]; and

46. PHG Technology Development and Services Company, Inc. - [D.I. 1, Case No. 18-12536].

**PLEASE TAKE FURTHER NOTICE** that, in addition to the filing of their voluntary petitions, the Debtors have filed the following first day motions and related pleadings (collectively, the “First Day Motions”):

**B. First Day Pleadings**<sup>4</sup>

1. Motion of the Debtors for Entry of an Order Directing Joint Administration of Chapter 11 Cases [ D.I. 2];
2. Motion of the Debtors for Entry of an Order (I) Authorizing the Debtors to File a Consolidated Creditor Matrix, (II) Authorizing the Debtors to File a Consolidated List of the Debtors’ 30 Largest Unsecured Creditors, and (III) Establishing Patient Notice Procedures[ D.I. 4];
3. Application of the Debtors for Appointment of Prime Clerk, LLC as Claims and Noticing Agent [D.I. 5];
4. Motion of the Debtors for Entry of an Order Authorizing Certain Procedures to Maintain the Confidentiality of Patient Information as Required By Applicable Privacy Rules [D.I. 6];
5. Motion of the Debtors for Entry of an Order (I) Extending the Time to File Schedules of Assets and Liabilities and Statements of Financial Affairs, (II) Extending the Time To File Initial Rule 2015.3 Financial Reports; and (III) Granting Related Relief [D.I. 7];
6. Motion of the Debtors for Entry of an Order (I) Authorizing the Payment of Certain Prepetition and Postpetition Taxes and Fees and (II) Granting Related Relief [D.I. 8];
7. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections By Utility Companies, and (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service [D.I. 9];
8. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing Continued Use of Existing Cash Management System and Bank Accounts; (II) Extending the Time to Comply With, or Seek a Waiver of, Certain United States Trustee Requirements and Section 345(B) of the Bankruptcy Code; (III) Authorizing Continued Performance of Intercompany Transactions; (IV) Granting

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<sup>4</sup> Docket references refer to the Docket of Case No. 18-12491.

Administrative Expense Priority to Postpetition Intercompany Claims; and (V) Granting Related Relief [D.I. 10];

9. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Maintain, Administer, Modify, and Renew Their Refund Programs and Practices and (II) Honor Obligations Related Thereto [D.I. 11];
10. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay or Honor Prepetition Obligations to Certain Critical Vendors and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Critical Vendors Obligations [D.I. 12];
11. Motion of the Debtors for Entry of Interim and Final Orders Authorizing the Debtors to (I) Continue Insurance Coverage Entered Into Prepetition and Satisfy Prepetition Obligations Related Thereto; (II) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies; (III) Honor the Terms of the Premium Financing Agreements and Pay Premiums Thereunder; and (IV) Enter Into New Premium Financing Agreements in the Ordinary Course Of Business [D.I. 13];
12. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Certain Prepetition Wages, Benefits and Other Compensation, and (B) Continue Employee Compensation and Employee Benefits Programs, and (II) Granting Related Relief [D.I. 14];
13. Motion of the Debtors for Entry of an Order Authorizing the Debtors to File Under Seal Certain Portions of Its Creditor Matrix Containing Certain Individual Creditor Information [D.I. 15]; and
14. Debtors' Motion For Entry of Interim and Final Orders (I) Authorizing Debtors to Obtain Postpetition Secured Financing Pursuant to Section of the Bankruptcy Code, (II) Authorizing the Debtors to Use Cash Collateral, (III) Granting Liens and Superpriority Administrative Expense Status, (IV) Granting Adequate Protection to the Prepetition ABL Parties, (V) Modifying the Automatic Stay, (VI) Scheduling a Final Hearing, and (VII) Granting Related Relief [D.I. 17].

**PLEASE TAKE FURTHER NOTICE** that, in addition to the filing of their voluntary petitions and First Day Motions, the Debtors have filed:

15. Declaration of Andrew Hinkelman in Support of Chapter 11 Petitions and First Day Motions [D.I. 18].

**PLEASE TAKE FURTHER NOTICE** that a hearing (the "First Day Hearing") with respect to the First Day Motions is scheduled for November 6, 2018 at 4:00 p.m. (Eastern Time) before the Honorable Chief Judge Christopher S. Sontchi at the United States Bankruptcy Court

for the District of Delaware, 824 Market Street, 5<sup>th</sup> Floor, Courtroom 6, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that any and all objections to the First Day Motions may be made at the First Day Hearing.

Dated: November 5, 2018  
Wilmington, Delaware

DLA PIPER LLP (US)

/s/ Stuart M. Brown

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*Proposed Attorneys for the Debtors and  
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