

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

**Gainesville Hospital District,
d/b/a North Texas Medical Center**

Debtor

**CASE NO. 17-40101
(JOINTLY ADMINISTERED)**

CHAPTER 9

**Ex Parte, Gainesville Hospital District
d/b/a North Texas Medical Center**

Plaintiff

ADV. PROC. NO. 17-04072

V.

**Hon. Ken Paxton,
Attorney General of the State of Texas**

Defendant

STATEMENT IN SUPPORT OF DEBTOR’S POSITION¹

**TO THE HONORABLE BRENDA T. RHOADES, UNITED STATES BANKRUPTCY
JUDGE:**

COME NOW Janae Hall, Kathleen Mitchell, Margaret Casey, Robert Casey, Danny Reeves, Audi Hayes Keown, Shirley Marshall Cawyer, Jim Gates, Teresa Harlow Westover, Lisa Blevens Bierschenck, Anne Marie Bangert Harp, Barbara Bezner, Cindy Mitchell Harendt, Cindy Muzny Wilborn, Donna Otts, Gayla Blanton, Glenda Lemons Liedtke, Jill Fuhrmann, Jo Ann Muller Hudson, Joane Lane, Joie Reed, Judy Barnes, Kaye Wimmer, Kerri Yosten Snider, Lee Ann Stewart, Linda Brule, Mary Lampkin, Patsy Thompson-Ehlert, Penny Medford Russell, Rachel

¹ By making the Statement set forth in this pleading, the listed parties in interest are neither providing an answer nor seeking to intervene, as provided for in Texas Gov’t Code § 1205.062, but merely making their views known to the Court in a responsible and respectful way.

Moore, Renee Schneiderjan Gregory, Rita Motsenbocker, Charlene Hardin, Stacie Miller, Susan Metler, June Hughes, Peggy Moore, Kristy Rigsby, Shane Greer, Gina Bezner, Cindy Kirkland, Shirley Knabe, Marcy Mullins, Beverly Herndon, Molly Gieb, James Hennigan, Brenda Case, Barbie Felderhoff, Karen Endres, Teresa Moselev, Megan Krebs, Beverly Herndon, Susan Whitley, and Sandy Carpenter, parties in interest (collectively, the “Parties in Interest”) to the above-styled adversary proceeding, and would show the Court as follows:

1. Each of the above-listed individuals and parties in interest (the “Parties”) are either:
 - a. current employees of the Debtor whose current and future well-being depends upon their continued productive employment and whose years of service entitle them to pension benefits under the Debtor’s defined benefit pension plan;
 - b. former employees of the Debtor whose years of service entitle them to pension benefits under the Debtor’s defined benefit pension plan; or
 - c. retired employees whose years of service entitle them to pension benefits under the Debtor’s defined benefit pension plan.
2. The Debtor, through the North Texas Medical Center, is a substantial employer and economic engine for the entire Gainesville community. Any closure or significant limitation of its current services will cause substantial harm, significant public inconvenience, and economic dislocation throughout North Texas.
3. The Parties applaud the efforts made by the Debtor to pay their pension benefits in full and to continue to strengthen the North Texas Medical Center’s operation. They understand that the relief the Debtor seeks through its Original Complaint will raise their taxes and trust that this Court’s scrutiny of the transactions involved will ensure that any tax increase will be no more than necessary.

Dated: August 18, 2017.

Respectfully submitted,

/s/ Michael R. Rochelle

Michael R. Rochelle

State Bar No. 17027600

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COUNSEL FOR THE PARTIES IN INTEREST

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of August, 2017, a copy of the foregoing was served electronically through the CM/ECF system of the United States Bankruptcy Court for the Eastern District of Texas on those parties identified thereon as receiving service through the CM/ECF system.

/s/ Michael R. Rochelle

Michael R. Rochelle