

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:	§	
	§	
GAINESVILLE HOSPITAL DISTRICT	§	Case No. 17-40101
D/B/A NORTH TEXAS MEDICAL	§	
CENTER, ¹	§	Adv. No. 17-04072
	§	
DEBTOR.	§	Chapter 9
	§	

DEBTOR’S MOTION FOR EXPEDITED HEARING ON (A) MOTION FOR VALIDATION AND APPROVAL OF SETTLEMENT AGREEMENT BETWEEN THE DEBTOR AND THE OFFICE OF INSPECTOR GENERAL, (B) DEBTORS’ SECOND MOTION FOR VALIDATION AND APPROVAL OF COMPENSATION FOR SERVICES AND REIMBURSEMENT FOR EXPENSES OF NORTON ROSE FULBRIGHT US LLP, DEBTOR’S COUNSEL, (C) MOTION FOR VALIDATION AND APPROVAL OF COMPENSATION FOR SERVICES AND REIMBURSEMENT FOR EXPENSES OF MUNSCHE HARDT KOPF & HARR, P.C., COMMITTEE CO-COUNSEL, (D) MOTION FOR VALIDATION AND APPROVAL OF COMPENSATION FOR SERVICES AND REIMBURSEMENT FOR EXPENSES OF SILLS CUMMIS & GROSS P.C., COMMITTEE CO-COUNSEL, (E) UNOPPOSED MOTION FOR APPROVAL OF STIPULATION AND AGREED ORDER BETWEEN DEBTOR AND THE TEXAS ATTORNEY GENERAL’S OFFICE, AND (F) DEBTOR’S MOTION FOR VALIDATION AND APPROVAL OF THE UNCOMPENSATED CARE REIMBURSEMENT LIABILITY

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

On January 17, 2017 (the “Petition Date”), the Gainesville Hospital District d/b/a North Texas Medical Center (the “Debtor”) filed a voluntary petition for relief under chapter 9 of title 11 of the United States Code (the “Bankruptcy Code”), thereby commencing the above-captioned municipal debt adjustment case (the “Case”). The Debtor requests expedited consideration of the following case matters:

1. Motion for Validation and Approval of Settlement Agreement Between the Debtor and the Office of Inspector General [Dkt No. 39];

¹ The last four digits of the Debtor’s federal tax identification number are: 1664. The location of the Debtor’s principal place of business and the service address for the Debtor is: 1900 Hospital Blvd., Gainesville, TX 76240.

2. Debtor's Second Motion for Validation and Approval of Compensation for Services and Reimbursement for Expenses of Norton Rose Fulbright US, LLP, Debtor's Counsel [Dkt. No. 41];
3. Motion for Validation and Approval of Compensation for Services and Reimbursement for Expenses of Munsch Hardt Kopf & Harr, P.C., Committee Co-Counsel;
4. Motion for Validation and Approval of Compensation for Services and Reimbursement for Expenses of Sills Cummis & Gross P.C., Committee Co-Counsel;
5. Unopposed Motion for Approval of Stipulation and Agreed Order Between Debtor and the Texas Attorney General's Office [Case No. 17-40101, Dkt. No. 177]; and
6. Debtor's Motion for Validation and Approval of the Uncompensated Care Reimbursement Liability [Dkt No. 40].

Notice of this Motion has been provided by e-mail, facsimile, or overnight delivery to: (a) the Office of the United States Trustee for the Eastern District of Texas; (b) the Debtor's secured lender; (c) the Official Committee of Unsecured Creditors; (d) those persons who have formally appeared in this Case and requested service; and (e) all applicable government agencies to the extent required by the Bankruptcy Rules and the Local Rules.

Accordingly, the Debtor would request these matters be set for an Expedited Hearing on **July 18 2018, at 3: 45 PM (prevailing Central time)** in the United States Bankruptcy Court, 660 North Central Expressway, Suite 300B, Plano, Texas 75074 and that upon hearing, this Court enter orders (i) validating and approving the Settlement Agreement between the Debtor and the Office of Inspector General; (ii) validating and approving compensation for services and reimbursement for expenses of Norton Rose Fulbright US LLP, Debtor's counsel; (iii) validating and approving compensation for services and reimbursement for expenses of Munsch Hardt Kopf & Harr, P.C., Committee Co-Counsel; (iv) validating and approving compensation for services and reimbursement for expenses of Sills Cummis & Gross P.C.,

Committee Co-Counsel; (v) approving the Stipulation and Agreed Order between the Debtor and the Texas Attorney General's Office; (vi) validating and approving the Uncompensated Care Reimbursement Liability and (vii) granting such other and further relief this Court deems just and equitable.

Dated: July 11, 2018
Dallas, Texas

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ William R. Greendyke,
William R. Greendyke (SBT 08390450)
Julie Goodrich Harrison (SBT 24092434)
1301 McKinney Street, Suite 5100
Houston, Texas 77010-3095
Telephone: (713) 651-5151
Facsimile: (713) 651-5246
william.greendyke@nortonrosefulbright.com
julie.harrison@nortonrosefulbright.com

AND

Ryan E. Manns (SBT 24041391)
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201-7932
Telephone: (214) 855-8000
Facsimile: (214) 855-8200
ryan.manns@nortonrosefulbright.com

**COUNSEL FOR THE DEBTOR AND
DEBTOR-IN-POSSESSION**

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Motion was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service.

/s/ Julie Goodrich Harrison

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ORDER GRANTING DEBTOR’S MOTION FOR EXPEDITED HEARING ON (A) MOTION FOR VALIDATION AND APPROVAL OF SETTLEMENT AGREEMENT BETWEEN THE DEBTOR AND THE OFFICE OF INSPECTOR GENERAL, (B) DEBTORS’ SECOND MOTION FOR VALIDATION AND APPROVAL OF COMPENSATION FOR SERVICES AND REIMBURSEMENT FOR EXPENSES OF NORTON ROSE FULBRIGHT US LLP, DEBTOR’S COUNSEL, (C) MOTION FOR VALIDATION AND APPROVAL OF COMPENSATION FOR SERVICES AND REIMBURSEMENT FOR EXPENSES OF MUNSCH HARDT KOPF & HARR, P.C., COMMITTEE CO-COUNSEL, (D) MOTION FOR VALIDATION AND APPROVAL OF COMPENSATION FOR SERVICES AND REIMBURSEMENT FOR EXPENSES OF SILLS CUMMIS & GROSS P.C., COMMITTEE CO-COUNSEL, (E) UNOPPOSED MOTION FOR APPROVAL OF STIPULATION AND AGREED ORDER BETWEEN DEBTOR AND THE TEXAS ATTORNEY GENERAL’S OFFICE, AND (F) DEBTOR’S MOTION FOR VALIDATION AND APPROVAL OF THE UNCOMPENSATED CARE REIMBURSEMENT LIABILITY

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

ON THIS DATE the Court considered the request for expedited hearing filed by Gainesville Hospital District d/b/a Norton Texas Medical Center (“Movant”) in conjunction with its (a) Motion for Validation and Approval of Settlement Agreement between the Debtor and the Office of Inspector General, (b) Debtor’s Second Motion for Validation and Approval of Compensation for Services and Reimbursement for Expenses of Norton Rose Fulbright US LLP, Debtor’s Counsel; (c) Motion for Validation and Approval of Compensation for Services and Reimbursement for Expenses of Munsch Hardt Kopf & Harr, P.C., Committee Co-Counsel; (d) Motion for Validation and Approval of Compensation for Services and Reimbursement for Expenses of Sills Cummis & Gross P.C., Committee

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Co-Counsel; (e) Unopposed Motion for Approval of Stipulation and Agreed Order Between Debtor and the Texas Attorney General's Office; and (f) Debtor's Motion for Validation and Approval of the Uncompensated Care Reimbursement Liability (collectively, the "Motions"), which were filed on July 11, 2018. The Court finds that the request complies with LBR 9007(c) and demonstrates that sufficient cause exists for shortening the normal response time and scheduling an expedited hearing on the Motions. Accordingly,

IT IS THEREFORE ORDERED that the request for emergency hearing is **GRANTED** and that a hearing on Movant's Motions shall be held on **July 18, 2018 at 3:45 PM (prevailing Central time)** in the Courtroom of the United States Bankruptcy Court, Suite 300B, 660 North Central Expressway, Plano, Texas 75074.

IT IS FURTHER ORDERED that the Movant or its counsel shall give notice of this expedited hearing by forwarding a copy of this Order by the most expedient means available, including electronic or telephonic transmission, or otherwise by First Class United States Mail, to all parties listed in the certificate of service contained in the Motions and shall evidence such service by the filing of a Certificate of Service with the Court prior to the scheduled hearing.