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

-----X
In re Chapter 11
Forest Park Medical Center at Frisco, LLC, Case No. 15-41684 (BTR)
Debtor.

-----X

**REPLY RE OBJECTION TO UNSECURED CREDITORS COMMITTEE
PROFESSIONALS' FIRST INTERIM APPLICATIONS FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED**

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

The Official Committee of Unsecured Creditors (the “Committee”) of Forest Park Medical Center at Frisco, LLC (“FPMC”) (the “Debtor”) appointed pursuant to section 1102 of title 11 of the United States Code §§ 101 *et seq.* (the “Bankruptcy Code”) in the above-captioned Chapter 11 case (the “Chapter 11 Case”), by and through its undersigned counsel, hereby respectfully submits this reply to *Objection to Unsecured Creditors Committee Professionals’ First Interim Applications for Allowance Of Compensation And Reimbursement of Expenses Incurred* [Doc. No. 469] (the “Objection”) as follows:

PRELIMINARY STATEMENT

1. Despite what seemed to be positive dialogue between the Committee and Sabra during the break at the sale hearing on February 18th, the Committee was blindsided by the Objection the very next day¹. Without providing the Committee professionals any notice of Sabra’s intent to object to fees, Sabra has raised a number of rushed, unsubstantiated and retributive objections that should be overruled.

2. Sabra objected to the interim fee applications (the “Applications”) of Arent Fox

¹ Regrettably, this has been a pattern of Sabra to raise issues or provide information at the 11th hour. For example, at the Final DIP Hearing, Sabra responded to the Committee’s issues with the DIP by presenting its responsive redline less than 10 minutes before the Final DIP Hearing was scheduled to begin – even though Sabra received the Committee’s comments five (5) days earlier – thereby leaving no time for the Committee to consider, let alone review, Sabra’s response. As it turned out, had Sabra given the Committee a mere two (2) hours to review and consider Sabra’s redline, a contested Final DIP Hearing could have been completely avoided. Sabra’s pattern of “gotcha” style litigation that is designed to embarrass and gain the upperhand has been counterproductive. The Committee remains a hopeful and willing partner that is eager to work with Sabra and the Debtor to obtain a recovery for all creditor classes. At this time, cooperation and a positive working relationship is essential for the overall success of the case. The Committee welcomes the opportunity to sit down with Sabra and address in a consensual manner any future issues with fees – as well as any other issue. Indeed, on February 11th, at the Committee’s request, counsel for the Committee met with counsel for Sabra and a principal from Sabra. During that meeting, counsel for the Committee made a short presentation about how to proceed in a constructive manner --- Sabra has never responded to any of the Committee’s proposals.

LLP and CohnReznick Advisory Group (the “Committee Professionals”²), even though the Committee Professionals provided competent, diligent, and efficient representation of the Committee during the Application Period. The Committee Professionals are within \$2,500 of the budget that was previously agreed to by Sabra for the period ending December 31, 2015 (the “Application Period”).

3. As this Court knows, committee professionals are often required to front load their efforts; thus, comparing the compensation requested by Committee Professionals on an interim basis through December 31, 2015 only tells half the story.³ Accordingly, the applications of the Committee Professionals should be approved as requested on an interim basis and any variances between the amounts billed and the budget should be reviewed at the end of the case.

4. The issues raised in Sabra’s Objection can be dealt with at the final fee application stage and should be overruled without prejudice at this time.

ARGUMENT

The Committee Professionals are Substantially Within the Budget and he Applications Should be Approved.

5. The agreed upon budget provides \$445,000 for Committee Professionals through January 3, 2016 and the compensation requested by the Committee Professionals for the Application Period is substantially within this budget. (This is the case even though the budget only contained \$15,000 per week for Committee Professionals during the first three weeks of

² Eric Liepins is local counsel to the Committee, but Mr. Liepins’ fees were not objected to.

³ For example, while the budget provides \$160,000 for Committee Professionals for the month of January 2016, the fee statements filed by the Committee Professionals show that they only billed approximately \$87,000 during the month of January.

their involvement.⁴) Additionally, it is worth noting that based on the fee statements filed by the Committee Professionals for the month of January, the Committee Professionals are well under budget through January 31, 2016⁵, such that from the beginning of the case through January 31, 2016 the Committee Professionals are, as a whole, also under budget.

6. However, Sabra asserts without any basis that the Committee professionals are \$40,000 over budget. Sabra does not include in its calculation the fees set aside for Committee Professionals for the week ending January 3, 2016, even though minimal amounts were billed the first three days of January (which included a New Year's day and a weekend). Therefore, the amount allocated for Committee Professionals in the budget for the period ending January 3, 2016 is actually \$445,000. Accordingly, the Committee Professionals are only over budget by \$2,237. Even adding in the approximately \$12,000 in fees and expenses incurred by local counsel, Eric Liepins, during the Application Period the Committee professionals are still less than \$15K over the agreed upon budget – a small variance of approximately 3%. The question of whether the Committee professionals are over budget for this case is a question that should be assessed at the end of the case.

7. Arent Fox's Compensation Should be Approved as Requested.

8. Sabra broadly alleges – without specific evidentiary support – that (1) the services provided were not necessary and/or duplicative, (2) the services did not provide a benefit to the estate, and (3) that Arent Fox's rates are too high.

⁴ The understanding being that by increasing the Committee Professional budget to \$40,000 during the 4th week, the overages during the first three weeks would eventually even out over the life of the case – something that is indeed happening and is standard and typical.

⁵ In January 2016 the Committee Professionals billed approximately \$87,000 as set forth in the monthly fee statements and the budget provided a reserve of \$160,000 for Committee Professionals. As such, through January 2016 the budget provides over \$600,000 for Committee Professionals and Committee Professionals are well under that amount.

9. With respect to the necessity of the work performed and the value provided to the Debtor's estate, Arent Fox had a significant amount of work to do at the very beginning of the case. At the Committee's direction, Arent Fox investigated the Debtor and its pre and post-petition operations as well as the complex relationships among non-debtor affiliates and non-estate debtors. The Committee has been investigating the complex events leading up to the Debtor's bankruptcy filing. Moreover, there have been challenges during this case that have transpired outside of the courtroom that do not need to be recited at this time that has made the Committee's job very difficult.

10. Arent Fox understands its duties to the Committee and has been working hard to fulfill them. On the other hand, Sabra has objected to the Applications because it sees an opportunity – after the sale has been approved – to renegotiate the budget it agreed to, which specifically earmarked \$445,000 for Committee Professionals during the Application Period.

11. Regarding the reasonableness of Arent Fox's hourly rates, such rates were clearly disclosed in Arent Fox's retention application, which was approved by this Court's order entered on November 20, 2015. That Court order provided, among other things, that "Arent Fox's hourly rates for its paralegals and attorneys as set forth in the Application and Hirsh Declaration are reasonable...." *See* Order Approving Arent Fox's Retention at ¶ 5. As such, this objection should be overruled.

12. CohnReznick's Compensation Should be Approved as Requested.

13. Sabra asserts that CohnReznick performed tasks that were duplicative of the Debtor's CRO and that CohnReznick spent too much time in connection with the DIP financing. To do this, Sabra lumps the services provided by CohnReznick into two narrow categories and then asserts the amounts billed for those categories are excessive rather than looking closely as

to what was actually done in the case.⁶ Indeed, a close review of the CohnReznick Application will show, however, that CohnReznick's services were necessary and covered the gamut of services typically provided by a financial advisor representing a committee.

14. With respect to the services related to the Debtor's budget and the proposed DIP financing, Sabra seems to assert that the CohnReznick should have just taken the Debtor's word for things. However, the Committee's financial advisor cannot just assume all is as the Debtor says it is. Rather, CohnReznick was required to carefully vet the proposed budget, compare it to the Debtor's historical financial performance and budget demands, and most importantly, independently verify the assumptions and historical numbers underlying the analysis put forward by the Debtor and its financial advisor. In the early stages of this case, this necessarily took a substantial amount of time.

CONCLUSION

WHEREFORE, the Committee respectfully requests that Sabra's Objection be overruled and that the Applications of Arent Fox LLP and CohnReznick LLP be approved on an interim basis as requested and that the Debtor be authorized and directed to pay the outstanding sum of such allowed amounts.

⁶ For example, the Objection states that CohnReznick billed \$44,810 in fees arising from "assisting counsel and evaluating the Debtor's proposed sale structure and timeline..." However, a closer review of the CohnReznick application shows that included in this supposedly single category is time spent by CohnReznick in Preference Analysis; Asset and Liability Analyses; Asset Disposition/Sale of Debtor's Assets; Executory Contract Review; Review of Proposed Transactions of Debtor; and Historical Financial Information Review. As such, \$44,810 during the Application Period is not unreasonable.

Dated: February 22, 2016

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Objection was sent to all parties requesting Notice via ECF and to all parties on the attached service list for US mail on February 22nd 2016.

/s/ Eric Liepins ___
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