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ATTORNEYS FOR CERTAIN PHYSICIANS

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

In re: §
FOREST PARK MEDICAL CENTER § CASE NO 15-41684
AT FRISCO, LLC § CHAPTER 11
Debtors. §

**LIMITED OBJECTION TO PROPOSED FINAL ORDER ON DEBTOR’S
APPLICATION TO EMPLOY
MICHAEL S. MILLER AS CHIEF RESTRUCTURING OFFICER**

TO THE HONORABLE BRENDA T. RHOADES, CHIEF U.S. BANKRUPTCY JUDGE:

Certain of the Class A physicians¹, as investors and limited guarantors of the Debtor’s lease obligations (“Physicians”), hereby file this Limited Objection (the “Objection”) to the Proposed Final Order on Debtor’s Application to Employ Michael S. Miller as Chief Restructuring Officer (the “Application”) [Docket No. 4]. In support of their Objection, the Physicians show this Court as follows:

PRELIMINARY STATEMENT

The Physicians paid \$25,000 per share for the opportunity to participate in the Debtor’s physician-owned hospital known as Forest Park Medical Center at Frisco (the “Hospital”). The

¹ As of the filing of this Objection, the number of physicians/entities represented is 44, a list of which is attached hereto.

investments of those represented here range from \$25,000 to \$1,500,000 and \$10,375,000 in the aggregate. Along with their investment, the Physicians also signed a limited guaranty for the rent at the Hospital of what is arguably 125% of their investment. Upon information and belief, the pre-petition rent arrearage owed the landlord and DIP financier Sabra Texas Holdings, L.P. exceeds \$7million.

The Application was approved on an interim basis by this Court on September 24, 2015 [Doc. No. 32] and set for final hearing on October 16, 2015 at 10:00 a.m. [Doc.35].

The Physicians do not object substantively to the Application, but rather to the terms of the proposed Order and suggest that more clear and definite language is required to allow the CRO to successfully perform his duties.

I. OBJECTION TO TERMS OF THE ORDER

1. Attached as **Exhibit "A"** hereto are redline and clean copies of the interim order showing the terms as proposed by the Physicians.

2. The Physicians whole-heartedly support the appointment of Mr. Miller as CRO and submit that the attached terms more closely align with the powers needed by Mr. Miller in order for the bankruptcy case to be successful.

CONCLUSION

WHEREFORE, based upon the foregoing and the entire record before the Court, the Physicians respectfully request that the Court sustain this limited objection to the Application, enter the order employing Mr. Miller in the form attached hereto and grant such other and further relief whether general, special, at law or in equity, as is just and appropriate under the circumstances of this case.

Respectfully submitted,

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By: /s/ Linda S. LaRue
Linda S. LaRue
Texas Bar No. 24046269

**ATTORNEYS FOR CERTAIN PHYSICIANS
AS SHOWN ON THE ATTACHED QSLWM
PHYSICIAN LIST**

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2015, a true and correct copy of the foregoing instrument was served by electronic transmission via the Court's CM/ECF system upon all parties registered to receive electronic notice in this bankruptcy case, and by regular U.S. first class mail, postage prepaid, on the parties listed on the attached mailing matrix.

/s/ Linda S. LaRue
Linda S. LaRue

4814-4668-1385, v. 1

QSLWM PHYSICIAN LIST

Aerie Castle Investment, LLC
Akal Partners, Ltd.
Madhavi Ampajwala, M.D.
FCC as Custodian of a Roth IRA FBO Bradley Axline, M.D.
Axline Caduceus Holdings, LTD.
Barneyard LTD. 04 2012 (fka HerpNoHerp Partners, LTD.)
Heather Bellanger, M.D. (fka Heather Licker, M.D.)
BJB Surgical Investments, LLC
Blue Falls Holdings, LLC
Blue Falls Holdings II, LLC
Cherie Booth, M.D.
Bryan J. Borgfeld, M.D.
Brethe Community Property, Ltd.
Jeffrey Cattorini, M.D.
Guy Culpepper, M.D.
Plano Women's Healthcare, PA Employee Profit Sharing FBO Marlene Diaz, M.D.
DPSI Holdings, LP
Paul R. Ellis, III, M.D.
Keith R. Eppich, M.D.
Bryan Ferguson, M.D.
Frisco DP Investment, LLC
Frisco Forest Park Investments, LLC
Frisco Pedi ENT Investments LLC
Alma Garza, M.D.
Sander Gothard, M.D.
Morris Gottlieb, M.D.
Grand Slam OB/Gyn, LLC
Alan Mark Greenberg, M.D.
NFS/FPTC FBO Rakesh Gupta, M.D. - Roth IRA
Rakesh Gupta, M.D.
Jason Harn, M.D.
Lowell T. Ku, M.D.
Michael Craig Maxwell, M.D.
Michael J. Musacchio, Jr. M.D. Holdings, LP
Lauren Michelsen, M.D.
Steven W. Michelsen, M.D.
Colin D. Pero, M.D.
James E. Rogers, M.D.
Michael Russo, M.D.
Silver Strike, Ltd.
Two Step Investments, LLC
Valenti Family Limited Partnership
Latha Yedlapalli, M.D.
Sri Yedlapalli, M.D.

4814-4668-1385, v. 1

EXHIBIT A

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

IN RE:	§	
FOREST PARK MEDICAL CENTER AT FRISCO, LLC	§	CHAPTER 11
DEBTOR.	§	CASE NO. _____ - BTR
	§	
	§	
	§	
	§	

FINAL ORDER APPROVING DEBTOR'S APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT, RETENTION AND DESIGNATION OF MICHAEL S. MILLER AS CHIEF RESTRUCTURING OFFICER, AS OF THE PETITION DATE

Upon consideration of the Application, dated September 22, 2015 (the "Application"),¹ of Forest Park Medical Center at Frisco, LLC, as debtor and debtor-in-possession (the "Debtor"), for an order approving the retention and employment of Michael S. Miller ("Mr. Miller") as Chief Restructuring Officer for the Chapter 11 Estate in the above-referenced case (the "Case"). The Application has been properly served. Upon review of the Application, it appears to the Court that the proposed professional is "disinterested" as that term is defined in 11 U.S.C. §101(14) and that the proposed professional represents or holds no interest adverse to the Estate. Accordingly,

IT IS THEREFORE ORDERED that the Application is **GRANTED** and that the employment of Mr. Miller as Chief Restructuring Officer for the Chapter 11 Estate in the above-referenced case is hereby **APPROVED** on a final basis; and it is further

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

ORDERED that the proposed use of the Debtor's assets pursuant to 11 U.S.C. §363(b) to retain Mr. Miller as set forth in the Application represents a reasonable exercise of the Debtor's business judgment; and it is further

ORDERED that Mr. Miller is retained by the Debtor as of the Petition Date to provide the ordinary course duties of a Chief Restructuring Officer and ~~may work with the Debtor to do the following~~ shall have the same rights, powers and responsibilities as a trustee in a chapter 11 case pursuant to section 1106 of the Bankruptcy Code; it is further

ORDERED that notwithstanding anything in the Application and/or the Debtor's articles of organization, bylaws or other corporate documents to the contrary²:

- The CRO shall have sole and complete dominion and control over the Debtor and its assets and business operations, and shall take all necessary steps to secure the Debtor's premises, books, records, and computer systems and to prevent access to them except as he deems desirable in his sole and absolute discretion.
- Manage the Debtor's Chapter 11 case, including, without limitation, sole management and oversight of any sale of the Debtor's assets and development of a Disclosure Statement and Plan of Reorganization, with no reporting responsibilities to the Debtor's Board.
- The CRO shall be responsible for all of the Debtor's managerial functions to be performed by or on behalf of the Debtor including managing the "working group" professionals who are assisting the Debtor in the reorganization process or who are working for the Debtor's various stakeholders to improve coordination of their effort and individual work product to be consistent with the Debtor's overall restructuring goals.
- The CRO shall take all necessary steps to become the sole and exclusive signatory on all of the Debtor's bank accounts and shall authority to sign checks, and make online payments or wire transfers on the Debtor's behalf.
- The CRO shall be authorized to make all of the Debtor's disbursements, payments or other transfers of assets by the Debtor, to incur indebtedness on the Debtor's behalf, and to execute

² To the extent of any discrepancy between this Order and the Application or this Order and the Interim Order, the terms of this Order shall control.

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contracts on the Debtor's behalf, all consistent with the applicable sections of the Bankruptcy Code.

- Assist in obtaining and presenting information required by parties in interest in the Debtor's bankruptcy process including official committees appointed by the United States Bankruptcy Court for the Eastern District of Texas.
- Provide assistance in such areas as testimony before this Court on matters that are within the scope of this engagement and within his area of testimonial competencies.
- Assist with such other matters as may be requested that fall within Mr. Miller's expertise and that are mutually agreeable.

ORDERED, that Mr. Miller's employment, retention and designation of Mr. Miller as Chief Restructuring Officer is in the best interests of the Debtor and the estate; and it is further

ORDERED that Mr. Miller will seek compensation and reimbursement of expenses as a professional included in the applications or notices of Deloitte according to the procedures later ordered by this Court or in accordance with applicable fee application procedures as provided in the Bankruptcy Code, Bankruptcy Rules, and local rules of this Court per the terms set forth in the Application; and it is further

ORDERED, that this Court shall retain jurisdiction over all matters arising from or related to the interpretation and implementation of this Order; and it is further

ORDERED that, notwithstanding anything herein to the contrary, the authority granted herein to the CRO, including ~~to make payments and honor~~making payments and honoring obligations, is subject in all respects to the terms and conditions of the Debtor's post-petition financing agreement, including any budget contained therein, and any order approving the same.

HONORABLE CHIEF JUDGE BRENDA T. RHOADES
UNITED STATES BANKRUPTCY JUDGE

PREPARED BY:

/s/ William L. Medford

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PROPOSED DEBTOR'S COUNSEL

4815-0224-0809, v. 1

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

IN RE: FOREST PARK MEDICAL CENTER AT FRISCO, LLC DEBTOR.	§ § § § § § § §	CHAPTER 11 CASE NO. _____ - BTR
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**FINAL ORDER APPROVING DEBTOR’S APPLICATION FOR ENTRY OF AN
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OF MICHAEL S. MILLER AS CHIEF RESTRUCTURING OFFICER,
AS OF THE PETITION DATE**

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- The CRO shall be responsible for all of the Debtor's managerial functions to be performed by or on behalf of the Debtor including managing the "working group" professionals who are assisting the Debtor in the reorganization process or who are working for the Debtor's various stakeholders to improve coordination of their effort and individual work product to be consistent with the Debtor's overall restructuring goals.
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- The CRO shall be authorized to make all of the Debtor's disbursements, payments or other transfers of assets by the Debtor, to incur indebtedness on the Debtor's behalf, and to execute

² To the extent of any discrepancy between this Order and the Application or this Order and the Interim Order, the terms of this Order shall control.

contracts on the Debtor's behalf, all consistent with the applicable sections of the Bankruptcy Code.

- Assist in obtaining and presenting information required by parties in interest in the Debtor's bankruptcy process including official committees appointed by the United States Bankruptcy Court for the Eastern District of Texas.
- Provide assistance in such areas as testimony before this Court on matters that are within the scope of this engagement and within his area of testimonial competencies.
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ORDERED, that Mr. Miller's employment, retention and designation of Mr. Miller as Chief Restructuring Officer is in the best interests of the Debtor and the estate; and it is further

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ORDERED, that this Court shall retain jurisdiction over all matters arising from or related to the interpretation and implementation of this Order; and it is further

ORDERED that, notwithstanding anything herein to the contrary, the authority granted herein to the CRO, including making payments and honoring obligations, is subject in all respects to the terms and conditions of the Debtor's post-petition financing agreement, including any budget contained therein, and any order approving the same.

HONORABLE CHIEF JUDGE BRENDA T. RHOADES
UNITED STATES BANKRUPTCY JUDGE

4811-8375-7609, v. 1

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Forest Park Medical Center at Frisco, LLC
Case No. 15-41684-BTR-11

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Case No. 15-41684-BTR-11

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Forest Park Medical Center at Frisco, LLC
Case No. 15-41684-BTR-11

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DALLAS TX 75266-0342

SECURED CREDITOR

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MARKET PRESIDENT
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MEMPHIS TN 38116

OLYMPUS AMERICA, INC.
3500 CORPORATE PARKWAY
CENTER VALLEY PA 18034

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MASTER SERVICE LIST
Forest Park Medical Center at Frisco, LLC
Case No. 15-41684-BTR-11

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MUNDELEIN IL 60060

LIFECCELL CORPORATION
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HOUSTON TX 77216-3888

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DALLS TX 75229

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WESTWOOD MA 02090

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MASTER SERVICE LIST
Forest Park Medical Center at Frisco, LLC
Case No. 15-41684-BTR-11

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