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**PROPOSED COUNSEL FOR THE DEBTORS**

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	§	<b>CHAPTER 11</b>
	§	
<b>FOUNDATION HEALTHCARE, INC.,</b>	§	<b>CASE NO. _____</b>
	§	
<b>DEBTOR.</b>	§	<b>Complex Case</b>
	§	<b>Designation Requested</b>

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<b>IN RE:</b>	§	<b>CHAPTER 11</b>
	§	
<b>UNIVERSITY GENERAL HOSPITAL, LLC,</b>	§	<b>CASE NO. _____</b>
	§	
<b>DEBTOR.</b>	§	<b>Complex Case</b>
	§	<b>Designation Requested</b>

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**NOTICE OF EXPEDITED HEARING ON  
CERTAIN “FIRST DAY” MATTERS**

PLEASE TAKE NOTICE that an expedited hearing to consider certain “first day” matters has been set for **July 5, 2017, at 1:30 p.m.** before the Honorable Russel F. Nelms, United States Bankruptcy Judge for the Northern District of Texas, Fort Worth, Division, Eldon B. Mahon U.S. Courthouse, 501 W. 10<sup>th</sup> Street, Fort Worth, Texas 76102. The following motions are set for consideration:

1. Debtors' Motion Pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedure for Entry of an Order Directing Joint Administration of Chapter 11 Cases (the "Administration Motion")

Case No. 17-42570 – Docket No. 5

Case No. 17-42571 – Docket No. 5

2. Motion of Debtors to (I) Authorize Certain Procedures to Maintain the Confidentiality of Patient Information, (II) for Authority to File Under Seal Separate Matrix and Schedule F Containing Patient Information, and (III) for Relief from Required Form of Mailing Matrix with Regard to Separate Matrix (the "Patient Privacy Motion")

Case No. 17-42570 – Docket No. 6

Case No. 17-42571 – Docket No. 6

3. Motion for Interim and Final Orders (1) Authorizing Secured Post-Petition Financing; (2) Authorizing the Use of Cash Collateral; (3) Granting Security Interests, Superpriority Claims, and Other Adequate Protection; (4) Modifying the Automatic Stay; and (5) Scheduling a Final Hearing (the "DIP Motion")

Case No. 17-42570 – Docket No. 8

Case No. 17-42571 – Docket No. 8

4. Debtors' Motion for an Order (A) Authorizing (I) the Debtors to Pay Pre-Petition Medical Insurance Benefits and (II) Banks to Honor and Pay Checks Issued to Pay Pre-petition Medical Insurance Benefits, and (B) Establishing a Deadline for the Submission and Administration of Medical Insurance Benefit Claims, and (C) Authorizing the Termination of the Debtors' Administrative Services Agreement (the "Employee Benefits Motion")

Case No. 17-42570 – Docket No. 9

Case No. 17-42571 – Docket No. 9

5. Debtors' Motion Pursuant to Sections 105(a), 345(b), 363(c) and 364(a) of the Bankruptcy Code for Authorization to (I) Continue to Use the Existing Cash Management System, (II) Maintain Existing Bank Accounts, and (III) Waive Certain Deposit Guidelines (the "Cash Management Motion")

Case No. 17-42570 – Docket No. 10

Case No. 17-42571 – Docket No. 10

6. Debtors' Application for an Order Appointing Donlin, Recano & Company, Inc. as Claims and Noticing Agent for the Debtors Pursuant to 28 U.S.C. § 156(c), Effective as of the Petition Date (the "Agent Motion")

Case No. 17-42570 – Docket No. 12

Case No. 17-42571 – Docket No. 11

Dated: June 23, 2017.

Respectfully submitted,

/s/ Vickie L. Driver

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