

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

In re:	§	Chapter 11
	§	
FOREST PARK MEDICAL CENTER AT	§	Case No. 16-40273-rfn-11
SOUTHLAKE, LLC,	§	
	§	HEARING DATE AND TIME:
Debtor.	§	August 18, 2016 @ 9:30 a.m.

**NOTICE OF HEARING TO CONSIDER FINAL APPROVAL OF DISCLOSURE  
STATEMENT AND CONFIRMATION OF CHAPTER 11 PLAN OF LIQUIDATION  
OF THE DEBTOR UNDER CHAPTER 11 OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE THAT** on July 11, 2016, Forest Park Medical Center at Southlake, LLC (“FPMC” or the “Debtor”), debtor-in-possession in the above captioned bankruptcy proceeding, filed the *First Amended Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code* [Docket No. 313] (as modified, amended, or supplemented from time to time, the “Plan”)<sup>1</sup> and the *First Amended Disclosure Statement Under 11 U.S.C. § 1125 in Support of the First Amended Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code* [Docket No. 314] (as modified, amended, or supplemented from time to time, the “Disclosure Statement”).

**PLEASE TAKE FURTHER NOTICE THAT:**

- 1. Disclosure Statement and Plan Hearing.** A hearing will be held before the Honorable Russell F. Nelms, Room 204, U.S. Courthouse, 501 W. Tenth Street, Fort Worth, Texas 76102, on **August 18, 2016 at 9:30 a.m. (Prevailing Central Time)** (the “Hearing”) to consider entry of an order, among other things, determining that the Disclosure Statement contains “adequate information” within the meaning ascribed to such term in section 1125 of the Bankruptcy Code, approving the Disclosure Statement, and confirming the Plan. The Debtor may modify the Plan, if necessary, prior to, during, or as a result of the Hearing, in accordance with the terms of the Plan. Any modifications to the Plan will be filed with the Court prior to the Hearing.
- 2. Copies of the Plan and Disclosure Statement.** Any party in interest that wishes to obtain a copy of the Plan and Disclosure Statement should contact Donlin, Recano & Company, Inc., Re: Forest Park Medical Center at Southlake, LLC, P.O. Box 192016, Blythebourne Station, Brooklyn, NY 11219, or by email at [DRCVote@DonlinRecano.com](mailto:DRCVote@DonlinRecano.com) or by telephone at (212) 771-1128. Interested parties may also examine and download the Plan and Disclosure Statement free of charge at <http://www.donlinrecano.com/fpmcsl>.
- 3. Objection Deadline and Procedures.** Objections, if any, to approval of the Disclosure Statement and/or the Plan must: (a) be in writing; (b) state the name and address of the objecting party and the amount and nature of the claim or interest of such party; (c) state with particularity the basis and nature of any objection to the Disclosure Statement and/or the Plan and/or proposed modification to the Plan; and (d) be filed, together with proof of service, with the Court and served so that they are actually received by the following parties no later than **August 11, 2016, at 4:00 p.m. (Prevailing Central Time)**: (i) counsel for the Debtor, Stephen M. Pezanosky, Haynes and Boone LLP, 301 Commerce Street, Suite 2600, Fort Worth, Texas 76102, [stephen.pezanosky@haynesboone.com](mailto:stephen.pezanosky@haynesboone.com); and (ii) the Office of the United States Trustee for the Northern District of Texas, 1100 Commerce Street, Room 976, Dallas, Texas 75242, Attn: Erin Schmidt, [erin.schmidt2@usdoj.gov](mailto:erin.schmidt2@usdoj.gov). Failure to file and serve any objection to the Disclosure Statement and/or the Plan in conformity with the foregoing procedures may result in the objecting party not being heard at the hearing.
- 4. Record Date for Voting Purposes.** Holders of claims in Class 1 (GAHC3 DIP Lender), Class 3 (Allowed Priority Non-Tax Claims), Class 4 (Allowed General Unsecured Claims) and Class 5 (Allowed Claim of GAHC3 Landlord) as of **July 12, 2016** (the “Record Date”) are entitled to vote on the Plan.

<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan.

5. **Voting Procedures.** If you are entitled to vote on the Plan, you will receive a solicitation package which will include a copy of (a) this Notice, (b) the Disclosure Statement and Plan (on CD), (c) the Solicitation Procedures Order, (d) a ballot, and (e) a return envelope. Please carefully review the voting instructions. **Failure to follow the voting instructions may disqualify your vote.**
6. **Voting Deadline.** The deadline to vote on the Plan is **August 11, 2016, at 4:00 p.m. (Central Time)** (the “Voting Deadline”). The Debtor’s balloting voting agent, Donlin, Recano & Company, Inc. (the “Balloting Agent”), must **actually receive**<sup>2</sup> your Ballot by the Voting Deadline. **Otherwise your vote will not be counted.**
7. **Parties in Interest Not Entitled to Vote.** Holders of claims in holders of Claims in Class 2 (Allowed Secured Tax Claims) and holders of Interests in Class 6 (Interests) are not entitled to vote on the Plan. Such holders will receive an appropriate Notice of Non-Voting Status instead of a Solicitation Package. If you have timely filed a proof of claim and disagree with the Debtor’s classification of, objection to, or request for estimation of, your claim and believe that you should be entitled to vote on the Plan, then you must serve the Debtor, and file with the Court, a motion (a “Rule 3018(a) Motion”) for entry of an order pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) temporarily allowing your claim in a different amount or in a different class for purposes of voting to accept or reject the Plan. All Rule 3018(a) Motions must be filed **on or before August 4, 2016**. As to any creditor filing a Rule 3018(a) Motion, such creditor’s vote will not be counted except as may be otherwise ordered by the Court. Creditors may contact Donlin, Recano & Company, Inc. at (800) 416-3743 to receive an appropriate Ballot for any claim for which a proof of claim has been timely filed and a Rule 3018(a) Motion has been granted. **Rule 3018(a) Motions that are not timely filed and served in the manner set forth above will not be considered.**
8. **ARTICLE IX OF THE PLAN CONTAINS CERTAIN EXCULPATIONS, RELEASES AND INJUNCTIONS. YOU ARE ENCOURAGED TO REVIEW THE TERMS OF THE PLAN.**
9. **Additional Information.** For more information about the solicitation procedures, or for copies of the Plan or Disclosure Statement, parties should contact the Debtor’s Balloting Agent, Donlin, Recano & Company Inc., at [DRCVote@DonlinRecano.com](mailto:DRCVote@DonlinRecano.com) or (212) 771-1128. The Plan, Disclosure Statement, and related documents may be examined and downloaded free of charge at <http://www.donlinrecano.com/fpmcsl>.
10. The Hearing may be adjourned from time to time without further notice to parties in interest other than by an announcement in Court of such adjournment on the date scheduled for the Hearing or as indicated in any notice of agenda of matters scheduled for hearing filed by the Debtor with the Court.

Dated; July 14, 2016

**HAYNES AND BOONE, LLP**

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**ATTORNEYS FOR DEBTOR**

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<sup>2</sup> For any Ballot cast via E-mail, a format of the attachment must be found in the common workplace and industry standard format (i.e., industry-standard PDF file) and a received date and time in DRC’s inbox will be used as a timestamp for a receipt.