

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(EASTERN DIVISION)

In re:

QUINCY MEDICAL CENTER, INC., *et al.*,
Debtors.

Chapter 11

Case no. 11-16394 (MSH)
(Jointly Administered)

**ASSENTED TO MOTION TO EXTEND DEADLINE TO RESPOND TO
ESTATE REPRESENTATIVE'S OBJECTION TO CLAIM OF 1199SEIU UNITED
HEALTHCARE WORKERS EAST AND TO CONTINUE HEARING THEREON**
[Request for an Expedited Determination without a hearing pursuant to MLBR 9013-1(e)(2)]

Craig R. Jalbert, as Trustee of the QMC Liquidation Trust (the "Liquidating Trustee"), by and through his undersigned counsel, hereby files this Assented to Motion (the "Motion") to extend the deadline for 1199SEIU United Healthcare Workers East (the "Claimant") and, together with the Liquidating Trustee, the "Parties") to file a written response to the Liquidating Trustee's pending objection [D.I. 612] (the "Objection") to the Claimant's filed proof of claim (the "Disputed Claim") for thirty (30) days and to continue the hearing on the Objection to July 26, 2012, at 2:00 PM, and in support of the motion respectfully states as follows:

1. The deadline for responses to the Objection is May 14, 2012, at 4:30 PM (the "Response Deadline"). A hearing on the Objection is scheduled for June 7, 2012, at 2:00 PM (the "Hearing").

2. The Parties have entered into discussions concerning the Objection and the Disputed Claim. At the present time, the Parties believe that an extension of the Response Deadline and a continuance of the Hearing would be beneficial to the Parties as they believe such an extension and continuance would provide a reasonable opportunity for the consensual resolution of issues among the Parties. Further, the Parties believe that an extension and continuance would be most economical for the Debtors' estate and would serve the interests of judicial economy.

3. Subject to this Court's approval pursuant to MLBR 5071-1, the Parties have agreed: (a) to extend the Response Deadline for thirty (30) days, from May 14, 2012, at 4:30 PM, to June 13, 2012, at 4:30 PM, and (b) to continue the Hearing from June 7, 2012, at 2:00 PM, to July 26, 2012, at 2:00 PM, or such other date and time as is convenient to this Court.

4. Because the current Response Deadline is set to expire on May 14, 2012, and the relief sought in this Motion is non-adversarial in nature, the Liquidating Trustee respectfully requests expedited determination consistent with MLBR 9013-1.

[Remainder of Page Intentionally Left Blank.]

WHEREFORE, the Liquidating Trustee respectfully requests that this Court issue an order: (a) granting the relief requested in this Motion; and (b) granting the Liquidating Trustee such other and further relief as this Court deems just and proper.

Dated: May 10, 2012
Boston, MA

Craig R. Jalbert, as Trustee of the QMC
Liquidation Trust,

By his attorneys,

/s/ Paul D. Moore
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ASSENTED TO:

1199SEIU United Healthcare Workers East,

By its attorney,

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* Pursuant to MLBR Appendix 8, Rule-8(b)(2), I, Paul D. Moore, represent that I have been authorized to affix the above electronic signature.

CERTIFICATE OF SERVICE

I, Paul D. Moore, hereby certify that on this day, May 10, 2012, I caused a copy of the foregoing *Assented to Motion to Extend Deadline to Respond to Estate Representative's Objection to Claim of 1199SEIU United Healthcare Workers East and to Continue Hearing Thereon [Request for an Expedited Determination Without a Hearing Pursuant to MLBR 9013-1(e)(2)]*, to be served as indicated, upon the parties set forth on the attached service list.

/s/ Paul D. Moore
Paul D. Moore (BBO#353100)

QUINCY MEDICAL CENTER, INC., et al.
Chapter 11 Case No. 11-16394(MSH) (Jointly Administered)

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