

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF LOUISIANA**

In re:	)	CHAPTER 11
	)	
LMCHH PCP, LLC, ¹	)	Case No. 17-10353
	)	(Jointly Administered)
Debtors.	)	
	)	SECTION B

**EX PARTE CONSENT MOTION TO CONTINUE HEARING
ON OBJECTION TO PROOF OF CLAIM NUMBER 1195 FILED BY
CRESCENT CITY ACO, LLC AGAINST LMCHH PCP, LLC
(CASE NO. 17-10353) [DKT. NO. 964]**

NOW INTO COURT, by and through undersigned counsel, comes Clifford Zucker, the Plan Administrator (“Plan Administrator”), who hereby respectfully moves to continue the hearing on the *Objection to Proof of Claim Number 1195 Filed by Crescent City ACO, LLC Against LMCHH PCP, LLC (Case No. 17-10353)* [Dkt. No. 964] (the “Objection”) for the following reasons:

1. The hearing on the Objection is presently scheduled for December 19, 2018 at 9:00 a.m.
2. The Plan Administrator is working with Crescent City ACO, LLC to possibly reach an agreeable, amicable resolution of the issues presented in the Objection.
3. Crescent City ACO, LLC has consented to continue the hearing on the Objection. Accordingly, the Plan Administrator requests that the Court continue the hearing on the Objection currently scheduled for December 19, 2018 at 9:00 a.m. to January 16, 2019 at 9:00 a.m., the Court’s regularly scheduled motion date.

¹ The Debtors in these cases are LMCHH PCP, LLC (Bankr. Case No. 17-10353 -JAB) and Louisiana Medical Center and Heart Hospital, LLC (Case No. 17-10354 -JAB)). The last four digits of the taxpayer identification numbers for each of the Debtors follow in parenthesis: (i) LMCHH PCP LLC (8569); and (ii) Louisiana Medical Center and Heart Hospital, LLC (7298). The mailing address for the Debtors is 64030 Highway 434, Lacombe, LA 70445.

4. The Plan Administrator submits that the relief requested herein will not prejudice any party-in-interest.

WHEREFORE, for the foregoing reasons, the Plan Administrator respectfully prays that the Court continue the hearing on the *Objection to Proof of Claim Number 1195 Filed by Crescent City ACO, LLC Against LMCHH PCP, LLC (Case No. 17-10353)* [Dkt. No. 964] from December 19, 2018 at 9:00 a.m. to January 16, 2019 at 9:00 a.m. The Plan Administrator also requests any further relief as is equitable and just.

New Orleans, Louisiana, this 7th day of December 2018.

/s/ Tristan Manthey

William H. Patrick, III (LA #10359)

Tristan Manthey (LA #24539)

Cherie D. Nobles (LA #30476)

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**COUNSEL FOR CLIFFORD ZUCKER,
PLAN ADMINISTRATOR**

CERTIFICATE OF SERVICE

I, Tristan Manthey, counsel for Clifford Zucker, the Plan Administrator, hereby certify that a copy of the *Ex parte Consent Motion to Continue Hearing on Objection to Proof of Claim Number 1195 Filed by Crescent City ACO, LLC Against LMCHH PCP, LLC (Case No. 17-10353)* [Dkt. No. 964] to be served on **December 7, 2018**, to all parties entitled to service via the Court's Electronic Filing System as follows: case.

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New Orleans, Louisiana, this 7th day of December, 2018.

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