

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

In re:	§	
	§	Case No. 18-60526-RBK
	§	
Little River Healthcare, LLC, <i>et al.</i> , ¹	§	Chapter 7
	§	
Debtors.	§	(Jointly Administered)
	§	

**JOINDER OF NORTON ROSE FULBRIGHT US LLP TO THE LIMITED OBJECTION
OF WALLER LANSDEN DORTCH & DAVIS, LLP TO THE EMERGENCY MOTION
FOR ORDER (I) AUTHORIZING CHAPTER 7 TRUSTEE TO
(A) LIQUIDATE AND PROTECT ESTATE ASSETS, (B) USE CASH COLLATERAL
AND GRANT ADEQUATE PROTECTION, AND (C) CONTINUE CASH
MANAGEMENT SYSTEM, AND (II) GRANT RELATED RELIEF**

[Related to Dkt. No. 724]

COMES NOW, Norton Rose Fulbright US LLP (“**NRF**”) former counsel of the Official Committee of Unsecured Creditors (the “**Committee**”)² of the above-captioned debtors (the “**Debtors**”), and hereby files this joinder (the “**Joinder**”) to *Waller Lansden Dortch & Davis, LLP’s (“Waller”) Limited Objection to the Entry of a Final Order on Emergency Motion for Order (I) Authorizing Chapter 7 Trustee to (A) Liquidate and Protect Estate Assets, (B) Use Cash Collateral and Grant Adequate Protection, and (C) Continue Cash Management System, and (II) Grant Related Relief* (the “**Limited Objection**”) [Dkt. No. 724]. In support of this Joinder, NRF states as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King’s Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare – Physicians of King’s Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688). The Debtors’ mailing address is 1700 Brazos Ave., Rockdale, TX 76567.

² Capitalized terms not otherwise defined herein maintain the meanings ascribed to them in the Limited Objection.

I.
BACKGROUND

1. On August 21, 2018, the office of the United States Trustee appointed the Committee comprised of the following entities: (i) True Health Diagnostics, LLC; (ii) PharMerica Corporation; and (iii) Computer Programs and Systems, Inc. pursuant to 11 U.S.C. § 1102 [Dkt. No. 120].

2. On August 22, 2018, the Committee selected NRF as its counsel. The Court entered the order approving the Committee's application to employ NRF on October 16, 2018 [Dkt. No. 323].

3. On December 7, 2018, the Court entered its Order Converting Chapter 11 Cases to Chapter 7 (the "Conversion Order"). The Committee dissolved upon entry of the Conversion Order.

4. On January 10 2019, the Court approved NRF's first and final application for allowance of compensation for services rendered and reimbursement of expenses incurred from the Petition Date through December 7, 2018 [Doc. 691].

II.
JOINDER

5. NRF hereby joins Waller's Limited Objection to the Motion.

III.
PRAYER

WHEREFORE, PREMISES CONSIDERED, NRF respectfully requests that this Court condition the use of Cash Collateral on the Trustee first fully funding the Carve-Outs for payment of allowed professional fees and expenses.

Dated: January 21, 2019

Respectfully Submitted,

NORTON ROSE FULBRIGHT US LLP

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*Former Counsel for the Official Committee of
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing has been sent pursuant to the applicable rules (Courts ECF System or U.S. First Class Mail, postage paid) on this 21st day of January, 2019 to the parties on the attached limited service list.

/s/ Ryan E. Manns

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