

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

IN RE:	*	CHAPTER 11
	*	
LMCHH PCP LLC, et al ¹	*	CASE NO. 17-10353
	*	
Debtors	*	

EX PARTE MOTION TO SUBSTITUTE COUNSEL

NOW INTO COURT, through undersigned counsel, comes Clifford A. Zucker, in his capacity as Plan Administrator² (the “Plan Administrator”), who respectfully moves this Court for an order allowing the law firm of Fishman Haygood, L.L.P. (“Fishman Haygood”) to be substituted for the law firm of Heller, Draper, Patrick, Horn & Manthey, L.L.C. (“Heller Draper”), as counsel of record in the above-captioned matter, and to direct that the Heller Draper law firm be withdrawn as counsel of record pursuant to LBR 2014(c).

On January 30, 2017, the Debtors filed for relief under Chapter 11 of the Bankruptcy Code, and subsequently, William H. Patrick, III, Tristan Manthey and Cherie Dessauer Nobles of/and Heller Draper were employed as counsel for the Plan Administrator. Effective October 15, 2020, William H. Patrick, III, Tristan Manthey and Cherie Dessauer Nobles have left the Heller Draper law firm and joined the Fishman Haygood law firm. Plan Administrator has agreed to the substitution of Fishman Haygood as bankruptcy counsel. Further, Plan Administrator requests that the Heller Draper law firm be permitted to withdraw as Plan Administrator’s counsel of record. Accordingly, Plan Administrator respectfully requests that William H. Patrick, III, Tristan

¹ 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

² Capital terms not defined herein shall have the same meaning as defined in the Amended Joint Plan of Liquidation [Dkt. No. 470].

Manthey and Cherie Dessauer Nobles remain as Plan Administrator's bankruptcy counsel and the law firm of Fishman Haygood be substituted as counsel of record for the Plan Administrator.

WHEREFORE, Plan Administrator moves this Court to enter an Order (i) substituting the firm of Fishman Haygood, L.L.P. for the firm of Heller, Draper, Patrick, Horn & Manthey, L.L.C., as counsel for the Plan Administrator in the above-captioned matter, and (ii) directing that the firm of Heller, Draper, Patrick, Horn & Manthey, L.L.C. be withdrawn as his counsel.

Dated: October 22, 2020.

Respectfully Submitted,

/s/Tristan Manthey

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Counsel for Clifford A. Zucker, Plan Administrator

CERTIFICATE OF SERVICE

I, Tristan Manthey, counsel for Clifford A. Zucker, Plan Administrator, do hereby certify that I caused the above and foregoing Motion to be served on October 22, 2020, to all parties entitled to service via the Court's Electronic Filing System as follows:

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