

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

**IN RE:** ) **CHAPTER 11**  
 )  
**REGIONAL HOUSING & COMMUNITY** ) **PROPOSED**  
**SERVICES CORP., et al.,** ) **Jointly Administered Under**  
 ) **CASE NO. 21-41034- pwb**  
**Debtors.** )

**APPLICATION FOR APPROVAL TO EMPLOY ATTORNEYS FOR DEBTORS**

COME NOW the above-captioned debtors and debtors and debtors-in-possession (collectively, the “**Debtors**” or “**Applicants**”)<sup>1</sup> in the above-styled jointly administered case (the “**Case**”), and respectfully apply for approval to employ attorneys pursuant to 11 U.S.C. § 327 and Bankruptcy Rule 2014. The grounds for this Application are:

1.

On August 26, 2021, Applicants each filed a voluntary petition for relief under Chapter 11 of Title 11, United States Code. Applicants wish to employ the law firm of SCROGGINS & WILLIAMSON, P.C. as their attorneys in the Chapter 11 Case.

2.

Attorneys in SCROGGINS & WILLIAMSON, P.C. are admitted to practice before this Court, are familiar with the Applicants’ legal and financial problems, have knowledge and experience in bankruptcy practice, and are well qualified to represent Applicants.

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<sup>1</sup> The Debtors in these chapter 11 cases include: Regional Housing & Community Services Corporation, RHCSC Columbus AL Holdings LLC, RHCSC Columbus Health Holdings LLC, RHCSC Douglas AL Holdings LLC, RHCSC Douglas Health Holdings LLC, RHCSC Gainesville AL Holdings LLC, RHCSC Gainesville Health Holdings LLC, RHCSC Montgomery I AL Holdings LLC, RHCSC Montgomery I Health Holdings LLC, RHCSC Montgomery II AL Holdings LLC, RHCSC Montgomery II Health Holdings LLC, RHCSC Rome AL Holdings LLC, RHCSC Rome Health Holdings LLC, RHCSC Savannah AL Holdings LLC, RHCSC Savannah Health Holdings LLC, RHCSC Social Circle AL Holdings LLC, and RHCSC Social Circle Health Holdings LLC.



3.

In the operation of their businesses during the Chapter 11 case, Applicants will require professional services from attorneys, including:

- a) Preparation of pleadings and applications;
- b) Conduct of examinations;
- c) Advising Applicants of their rights, duties and obligations as debtor-in-possession;
- d) Consulting with Applicants and representing Applicants with respect to a Chapter 11 plan and/or a sale of the Applicants' assets;
- e) Performing legal services incidental and necessary to the day-to-day operation of Applicants' affairs, including, but not limited to, institution and prosecution of necessary legal proceedings, and general business and corporate legal advice and assistance; and
- f) Taking any and all other action incidental to the proper preservation and administration of Applicants' estates.

4.

To the best of Applicants' knowledge: (a) SCROGGINS & WILLIAMSON, P.C. represents no interests adverse to Applicants in the matters upon which the firm is to be engaged for Applicants; (b) except as otherwise disclosed in the Declaration submitted herewith, SCROGGINS & WILLIAMSON, P.C. has had no connection with Applicants, their creditors or any party in interest, or their respective attorneys and accountants, and (c) the firm's appointment will be in the best interest of Applicants and Applicants' estates.

5.

Applicants desire to employ SCROGGINS & WILLIAMSON, P.C. at the firm's ordinary rates for comparable work at this time, plus reasonable expenses, subject to review by the Court.

The firm has stated that its fee rates currently range from \$475.00 - \$540.00 per hour for attorneys and from \$135.00 - \$175.00 per hour for paralegals. Rates may be adjusted from time-to-time. The firm is currently holding approximately \$105,238.50 as a Chapter 11 retainer to represent Applicants.

6.

Attached hereto and incorporated herein by reference is the Declaration of a member of SCROGGINS & WILLIAMSON, P.C. offered in support of this Application.

WHEREFORE, Applicants pray that they be authorized to employ SCROGGINS & WILLIAMSON, P.C. as their attorneys in this Chapter 11 Case.

*[Signatures on Next Page]*

This 27th day of August, 2021.

Regional Housing & Community Services Corporation  
RHCSC Columbus AL Holdings LLC  
RHCSC Columbus Health Holdings LLC  
RHCSC Douglas AL Holdings LLC  
RHCSC Douglas Health Holdings LLC  
RHCSC Gainesville AL Holdings LLC  
RHCSC Gainesville Health Holdings LLC  
RHCSC Montgomery I AL Holdings LLC  
RHCSC Montgomery I Health Holdings LLC  
RHCSC Montgomery II AL Holdings LLC  
RHCSC Montgomery II Health Holdings LLC  
RHCSC Rome AL Holdings LLC  
RHCSC Rome Health Holdings LLC  
RHCSC Savannah AL Holdings LLC  
RHCSC Savannah Health Holdings LLC  
RHCSC Social Circle AL Holdings LLC  
RHCSC Social Circle Health Holdings LLC

\_\_\_\_\_  
/s/ Bryan W. Starnes

By: Bryan W. Starnes  
Its: Authorized Officer

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<b>IN RE:</b>	)	<b>CHAPTER 11</b>
	)	
<b>REGIONAL HOUSING &amp; COMMUNITY SERVICES CORP., et al.,</b>	)	<b>PROPOSED</b>
	)	<b>Jointly Administered Under</b>
<b>Debtors.</b>	)	<b>CASE NO. 21-41034- pwb</b>
	)	

**DECLARATION OF J. ROBERT WILLIAMSON IN SUPPORT OF DEBTORS’  
APPLICATION FOR APPROVAL TO EMPLOY ATTORNEYS FOR DEBTORS**

I, J. Robert Williamson, declare under penalty of perjury as follows:

1.

I am a member of the law firm of Scroggins & Williamson, P.C. (the “**Firm**”), and in that capacity I have personal knowledge of, and authority to speak on behalf of, the Firm with respect to the matters set out herein. This Declaration is offered in support of the Application of the Debtors in the above-styled jointly administered case to employ the Firm as the Debtors’ attorneys (the “**Application**”), and the matters set out herein are true and correct to the best of my knowledge, information and belief.

2.

To the best of my knowledge, other than pre-petition services rendered to the Debtors in evaluating and preparing for the Chapter 11 filings, neither the Firm nor I have or represent any interest adverse to the Debtors or their estates, or have any material connections with the Debtors, their creditors, any other party in interest or their respective attorneys or accountants. The Firm

is disinterested, as that term is defined in 11 U.S.C. § 101(14).

3.

The Firm has no principals, associates or other professional employees who are related to any Judge of the United States Bankruptcy Court for the Northern District of Georgia.

4.

Prior to the commencement of this Chapter 11 case, the Firm has been paid approximately \$91,958.50 from a pre-petition retainer for advising and assisting the Debtors in connection with this jointly administered Chapter 11 case and reimbursement of expenses (including \$29,546.00 for Chapter 11 filing fees). The Firm currently holds a retainer in the amount of approximately \$105,238.50. Neither the Firm nor I have agreed to share any compensation or reimbursement received in connection with this engagement with any other person or entity.

5.

Other attorneys of the Firm and I are duly admitted to practice law in the United States District Court for the Northern District of Georgia, among other United States Courts.

6.

Employment of the Firm as attorneys for the Debtors would be appropriate under 11 U.S.C. § 327 and Bankruptcy Rule 2014.

This 27th day of August, 2021.

/s/ J. Robert Williamson  
J. ROBERT WILLIAMSON

*Penalty for making a false statement or concealing property:* Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. §§152 and 3571.