

**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.)

**REQUEST FOR EXPEDITED CONSIDERATION
OF CERTAIN FIRST DAY MATTERS**

On August 26, 2021, the above-captioned debtors and debtors and debtors-in-possession (collectively, the “**Debtors**”)¹ each filed a petition for relief under Chapter 11 of the Bankruptcy Code. The Debtors assert that the cases qualifies as a “Complex Chapter 11 Cases” and that they need expedited consideration of the following initial case matters:

- X JOINT MOTION FOR JOINT ADMINISTRATION.
- X MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS.
- X MOTION RE MAINTENANCE OF BANK ACCOUNTS AND EXISTING CASH MANAGEMENT.
- X MOTION TO PAY PRE-PETITION WAGES, SALARIES, *ET AL.*
- X MOTION FOR ENTRY OF INTERIM ORDER AUTHORIZING USE OF CASH COLLATERAL.

¹ 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.



X MOTION FOR INTERIM APPROVAL OF POST-PETITION SECURED AND SUPER PRIORITY FINANCING PURSUANT TO SECTION 364 (c) OF THE BANKRUPTCY CODE.

 X MOTION PURSUANT TO 11 U.S.C. § 366, FOR ENTRY OF INTERIM ORDER (1) DETERMINING ADEQUATE ASSURANCE OF PAYMENT FOR FUTURE UTILITY SERVICES AND (2) RESTRAINING UTILITY COMPANIES FROM DISCONTINUING, ALTERING, OR REFUSING SERVICE.

 MOTION TO ESTABLISH INTERIM NOTICE PROCEDURES.

 MOTION FOR ORDER APPROVING INTERIM RETENTION OF PROFESSIONALS.

 MOTION FOR ORDER APPROVING PAYMENT OF PRE-PETITION CLAIMS OF CERTAIN CRITICAL VENDORS.

 X OTHERS (LIST):

MOTION FOR AUTHORITY TO RETAIN KURTZMAN CARSON CONSULTANTS LLC AS CLAIMS, NOTICING, AND BALLOTING AGENT FOR THE DEBTOR

MOTION FOR AUTHORITY TO CONTINUE PRE-PETITION INSURANCE PROGRAMS AND TO PAY PRE-PETITION PREMIUMS

This 27th day of August, 2021.

Respectfully submitted,

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