UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF NORTH CAROLINA GREENSBORO DIVISION

IN RE:)	
)	Case No. 17-10775
MOREHEAD MEMORIAL HOSPITAL,)	
)	Chapter 11
Debtor.)	
)	

PROPOSED AGENDA FOR MARCH 22, 2018 HEARING

Morehead Memorial Hospital, the debtor and debtor-in-possession in the above captioned bankruptcy case (the "<u>Debtor</u>"), by and through its undersigned counsel, and pursuant to paragraph 21 of the *Order Establishing Certain Notice and Case Management Procedures* [Dkt No. 49] (the "<u>Case Management Order</u>"), hereby files a proposed agenda outlining the matters to be heard by the Court on March 22, 2018 at 9:30 a.m. (the "<u>Proposed Agenda</u>"). The Proposed Agenda is attached hereto as **Exhibit A**.

Respectfully submitted, this the 21st day of March, 2018.

WALDREP LLP

/s/ Thomas W. Waldrep, Jr.

Thomas W. Waldrep, Jr. (NC State Bar No. 11135)

Jennifer B. Lyday (NC Bar No. 39871)

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Attorneys for the Debtor

EXHIBIT A

UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF NORTH CAROLINA GREENSBORO DIVISION

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PROPOSED AGENDA FOR MARCH 22, 2018 HEARING

Matters with No Responses Filed As of 3:00pm on March 21, 2018:

Matters with Responses Filed As of 3:00pm on March 21, 2018:

- 1) Amended Notice of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment [Dkt. No. 301] and Notice of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment [Dkt. No. 245]
 - a. Response by Laboratory Corporation of America Holdings [Dkt. No. 306]
 - b. Limited Objection by Novant Health Inc. [Dkt. No. 319]
 - c. Response by U.S. Bank Equipment Finance [Dkt. No. 363]
 - d. Limited Objection by Aetna Health, Inc. [Dkt. No. 364]
 - e. Objection by Aramark Healthcare Technologies, LLC [Dkt. No. 367]
 - f. Objection by Blue Cross Blue Shield of North Carolina [Dkt. No. 374]
 - g. Amended Objection by Aramark Healthcare Technologies, LLC [Dkt. No. 399]
 - h. Objection by NCDHHS [Dkt. No. 446]
 - i. First Supplement filed by Debtor [Dkt. No. 612]
 - j. Movant has received a continuance of the hearing on these Objections to the Amended Cure Notice to the next omnibus hearing date, currently set for April 10, 2018. [Dkt. No. 690]
- 2) Motion by The University of North Carolina Health Care System to Enforce Sale Order [Dkt. No. 582]
 - a. Exhibit to Motion by UNCHCS [Dkt. No. 583]
 - b. Response by Debtor [Dkt. No. 620]
 - c. Brief in Opposition by AHC [Dkt. No. 676]
 - d. Response by OCUC [Dkt. No. 687]
- 3) Hearing to determine whether cause exists to convert this case to Chapter 7 [Dkt. No. 600]
 - a. Response by OCUC [Dkt. No. 617]
 - b. Joinder by Debtor to OCUC Response [Dkt. No. 619]
 - c. Response by UNCHCS [Dkt. No. 626]
 - d. Response by Bankruptcy Administrator [Dkt. No. 628]

- 4) Motion for Relief from Stay regarding Setoff of GAP Payment filed by Creditor NC Department of Health and Human Services, Division of Medical Assistance [Dkt. No. 614]
 - a. Movant has received a continuance of the hearing on this Motion to the hearing date of April 10, 2018 [Dkt No. 684]
- 5) Motion of Debtor for Entry of Order Allowing Certain Administrative Expense Claims of Debtor's Former Employees Related to Paid Annual Leave Accrued Post-Petition [Dkt. No. 667]
 - a. Amended Exhibits to Motion by Debtor [Dkt. No. 693]

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)	

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **PROPOSED AGENDA FOR MARCH 22, 2018 HEARING** was filed electronically in accordance with the local rules and was served upon those listed in **Exhibit B** on the date set forth by first class mail or by electronic service through CM/ECF and email.

Dated: March 21, 2018

WALDREP LLP

/s/ Thomas W. Waldrep, Jr.

Thomas W. Waldrep, Jr. (NC State Bar No. 11135)

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Attorneys for the Debtor

EXHIBIT B

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VIA U.S. MAIL		
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US ATTORNEYS OFFICE, MIDDLE DISTRICT OF NORTH CAROLINA ATTN: CIVIL PROCESS CLERK 101 SOUTH EDGEWORTH STREET 4TH FLOOR GREENSBORO NC 27401	N.C. DEPT OF HEALTH & HUMAN SERVICES DIV.OF MED. ASSISTANCE; ATTN: GEN. COUNSEL LISA CORBETT ADAMS BUILDING 101 BLAIR DRIVE RALEIGH NC 27603	NORTH CAROLINA ATTORNEY GENERAL JOSH STEIN PO BOX 629 RALEIGH NC 27602-0629