

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

In re:	Chapter 11
SENIOR CARE GROUP, INC.,	Case No. 8:17-bk-6562-CPM
	Jointly Administered with:
KEY WEST HEALTH AND REHABILITATION CENTER, LLC,	Case No. 8:17-bk-06580-CPM
SCG BAYWOOD, LLC,	Case No. 8:17-bk-06563-CPM
SCG GRACEWOOD, LLC,	Case No. 8:17-bk-06564-CPM
SCG HARBOURWOOD, LLC,	Case No. 8:17-bk-06572-CPM
SCG LAURELLWOOD, LLC,	Case No. 8:17-bk-06576-CPM
THE BRIDGES NURSING AND REHABILITATION, LLC,	Case No. 8:17-bk-06579-CPM
Debtors.	

_____ /

**MOTION FOR EXTENSION OF PERIODS
OF DEBTORS' EXCLUSIVE RIGHT TO FILE
CHAPTER 11 PLAN AND TO SOLICIT ACCEPTANCES**

SENIOR CARE GROUP, INC., KEY WEST HEALTH AND REHABILITATION CENTER, LLC, SCG BAYWOOD, LLC, SCG GRACEWOOD, LLC, SCG HARBOURWOOD, LLC, SCG LAURELLWOOD, LLC, and THE BRIDGES NURSING AND REHABILITATION, LLC, (collectively, the “**Debtors**”), by and through their undersigned counsel, hereby files their *Motion for Extension of Periods of Debtors' Exclusive Right to File Chapter 11 Plan and to Solicit Acceptances* (the “**Motion**”) and request that the Court extend the periods during which the Debtors have the exclusive right to file a Chapter 11 plan and to solicit

acceptances. As background and support for the requested extension of exclusivity, the Debtors state the following:

Jurisdiction and Venue

1. This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. §§157 and 1334. The subject matter of this Motion is a core proceeding pursuant to 28 U.S.C. §157(b). Venue is proper in this district pursuant to 28 U.S.C. §1408.

2. The statutory predicates for the relief requested by this Motion are Sections 1121(b), 1121(c)(2), 1121(c)(3), and 1121(d) of the Bankruptcy Code. Sections 1121(b) and (c) of the Bankruptcy Code prescribe the periods of exclusivity during which only the Debtors may file a plan of reorganization. Sections 1121(b) and 1121(c)(2) of the Bankruptcy Code provide that only the Debtors may file a plan for 120 days following the filing of the Chapter 11 petition. Section 1121(c)(3) extends that period to 180 days for acceptances to be obtained. Section 1121(d)(1) gives the Court authority for cause shown to increase the 120-day period or the 180-day period, subject to Section 1121(d)(2).

Background

3. On July 27, 2017 (the “**Petition Date**”), the Debtors filed their Voluntary Petition for Relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”).

4. The Debtors are managing their properties and operating their businesses as debtors in possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

5. No previous application for the relief sought herein has been made by the Debtors to this Court or any other court.

Relief Requested and Grounds for Relief

6. Sections 1121(b) and (c) of the Bankruptcy Code prescribe the periods of exclusivity during which only the debtor may file a plan of reorganization. Sections 1121(b) and 1121(c)(2) of the Bankruptcy Code provide that only the debtor may file a plan until after 120 days following the Petition Date. But for the filing of this Motion, the 120-day period would expire on February 28, 2018. Section 1121(c)(3) statutorily extends the exclusivity period until 180 days after the Petition Date to permit the debtor to obtain acceptances of a plan as filed. But for the filing of this Motion, the 180-day period would expire on May 1, 2018.¹

7. Section 1121(d)(1) of the Bankruptcy Code provides that the Court for cause may reduce or increase the 120-day period or the 180-day period.

8. By this Motion, the Debtors request that the Court extend both exclusivity periods such that the extended 120-day period would expire on February 28, 2018, and the extended 180-day period would expire on May 1, 2018.

9. On November 11, 2017, the Court entered its *Order on Motion of SCG Baywood, LLC, SCG Gracewood, LLC, SCG Harbourwood, LLC, and SCG Laurellwood, LLC for Entry of an Order (I) Approving Bid Procedures in Connection with the Sale of Substantially All of Their Assets to TL Capital Management, LLC, (II) Establishing Procedures for the Assumption and/or Assignment by the Debtors of Certain Executory Contracts and Unexpired Leases, (III) Approving Break Up Fee and Minimum Overbid Amount, (IV) Approving Form and Manner of Notice of Bid Procedures, and (V) Setting Objection Deadlines* [Doc. No. 228] (the “**Bid Procedures Order**”). Pursuant to the Bid Procedures Order, Debtors SCG Baywood, LLC, SCG Gracewood, LLC, SCG Harbourwood, LLC, and SCG Laurellwood, LLC are conducting a

¹ The 180-day period would expire on Sunday, April 29, 2018. Pursuant to Rule 9006(a)(1)(C) of the Federal Rules of Bankruptcy Procedure, the 180-day period would fall on Monday, May 1, 2018.

sale and auction process with respect to certain of their assets, with a sale hearing scheduled for Monday, January 29, 2018. The outcome of the sale process will affect the distributions to be proposed by the Debtors in the plan. The Debtors, therefore, request an extension of the Debtors' exclusive period to file a plan and of the deadline by which the Debtors may obtain acceptances of such plan.

10. In addition, the Court pursuant to its *Order Continuing Initial Status Conference* established November 29, 2017 as the deadline by which the Debtors are to file their disclosure statement and plan. Simultaneously with the filing of this Motion, therefore, the Debtors are filing their *Motion for Extension of Time to File Plan and Disclosure Statement* and request an extension through and including February 28, 2018 to file their plan and disclosure statement.

11. This Motion is not submitted for purposes of delay and the Debtors submit that the relief requested in this Motion will not prejudice any party.

WHEREFORE, the Debtors respectfully request that the Court enter an order: (a) granting this Motion; (b) extending the 120-day time period during which the Debtors have the initial exclusive right to propose and file a Chapter 11 plan through and including February 28, 2018, without prejudice to the Debtors' rights to seek further extension; (c) extending the 180-day period during which the Debtors have the exclusive right to solicit acceptances of a plan

through and including May 1, 2018, without prejudice to the Debtors' rights to seek further extension; and (d) providing such other relief as is just and proper.

/s/ Scott A. Stichter
Scott A. Stichter (FBN 0710679)
Elena Paras Ketchum (FBN 0129267)
Stichter Riedel Blain & Postler, P.A.
110 East Madison Street, Suite 200
Tampa, Florida 33602
Telephone: (813) 229-0144
Email: sstichter@srbp.com
Email: eketchum@srbp.com
Attorneys for Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing *Motion for Extension of Periods of Debtors' Exclusive Right to File Chapter 11 Plan and to Solicit Acceptances* have been furnished on this 21st day of November, 2017, by either the Court's electronic CM/ECF noticing to the United States Trustee and all other parties receiving CM/ECF electronic noticing or by U.S. mail to the attached LBR 1007-2 Parties in Interest matrix.

/s/ Scott A. Stichter
Scott A. Stichter (FBN 0710679)

Label Matrix for local noticing
113A-8
Case 8:17-bk-06562-CPM
Middle District of Florida
Tampa
Wed Nov 15 15:40:08 EST 2017

Amerisure Mutual Insurance Company
c/o Timothy W. Brink
Meltzer, Purtill & Stelle LLC
300 South Wacker Drive, Suite 2300
Chicago, Illinois 60606-6701

BVM Management, Inc.
c/o Michael D. Magidson
333 3rd Ave. North ste 200
St. Petersburg, FL 33701-3833

Bush Ross
Attn: Jeffrey W. Warren, Esq.
PO Box 3913
Tampa, FL 33601-3913

Cadence Bank, N.A.
c/o Balch & Bingham LLP
841 Prudential Drive, Suite 1400
Jacksonville, FL 32207-8364

Centennial Bank
c/o Cy Norman, First Vice President
Special Assets Department
2415 Aloma Ave.
Winter Park, FL 32792-2519

Chad Hagan
995 Canton Street
Suite 100
Roswell, GA 30075-4240

Coast Brothers
Patrick Collins
6511 43rd St. N. Unit 1807
Pinellas Park, FL 33781-5952

David Dudik
c/o Iurillo Law Group, P.A.
5628 Central Avenue
St. Petersburg, FL 33707-1718

David R. Goehring
25 Twin Lakes Lane
Buffalo, WY 82834-9638

David R. Vaughan
c/o Buddy D. Ford, PA
9301 W. Hillsborough Ave.
Tampa, FL 33615-3008

Fifth Third Bank
c/o Mark J. Wolfson, Esq.
Foley & Lardner LLP
100 North Tampa Street
Suite 2700
Tampa, FL 33602-5810

Harbor Community Bank
c/o Mark S. Mitchell, Esq.
Rogers Towers, P.A.
1301 Riverplace Blvd., Ste. 1500
Jacksonville, FL 32207-9020

Harborwood/Gracewood Acquisition, LLC,
c/o Bryan Cave, LLP
200 S. Biscayne Blvd.
Miami 33131-2310

Harbourwood TIC Owners
c/o Iurillo Law Group, P.A.
5628 Central Avenue
St. Petersburg, FL 33707-1718

Healthcare Services Group, Inc.
c/o Patrick J. Orr
3220 Tillman Dr Suite 300
Bensalem, PA 19020-2028

Healthcare Services Group, Inc.
c/o Carney Law Firm, P.A.
Nathan A. Carney, Esq.
400 N. Ashley Dr., Suite 2600
Tampa, FL 33602-4310

LQC Partners VII, LLC
c/o Richard B. Storf, Esq.
Rice Pugatch, et al.
101 Northeast Third Avenue, Suite 1800
Fort Lauderdale, Florida 33301-1252

Medicaid Done Right, LLC.
c/o Larry Rayburn
13825 Icot Blvd. Ste 611
Clearwater, FL 33760-3712

Official Committee of Unsecured Creditors
Lori V. Vaughan, Esq.
Trenam, Kemker, Scharf, Barkin et al
101 East Kennedy Blvd. Ste 2700
Tampa, FL 33602-5150

Pinellas County Tax Collector
Post Office Box 6340
Clearwater, FL 33758-6340

Regal Healthcare Acquisition
c/o Joel Aresty PA
309 1st Ave. S.
Tierra Verde, FL 33715-2231

Robert Lapowsky
Stevens and Lee
620 Freedom Business Center
Ste 200
King of Prussia, PA 19406-1330

TL Management LLC
c/o Elizabeth A. Green, Esq.
Baker & Hostetler LLP
200 S. Orange Ave., SunTrust Center, Ste
Orlando, FL 32801-3432

The Home Association
c/o Thomas M. Wood, Esq.
Shumaker, Loop & Kendrick, LLP
101 E. Kennedy Blvd., Suite 2800
Tampa, FL 33602-5153

The Home Association, Inc.
777 S. Harbour Island Blvd. Suite 128
Tampa, FL 33602-5701

TwinMed, LLC
c/o Steve Rechnitz
11333 Greenstone Ave
Santa Fe Springs, CA 90670-4618

WCC Business Solutions
dba of Gordon B. Link Industries, Inc.
c/o Brad W. Hissing, Esq.
Wetherington Hamilton, P.A.
1010 N Florida Ave
Tampa, FL 33602-3808

End of Label Matrix
Mailable recipients 27
Bypassed recipients 0
Total 27