

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
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In re:	Chapter 11
SENIOR CARE GROUP, INC.,	Case No. 8:17-bk-6562-CPM
	<i>Jointly Administered with:</i>
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.	

**DEBTORS' EMERGENCY MOTION FOR
AUTHORITY TO USE CASH COLLATERAL TO MAKE
SHORT-TERM ADVANCE TO SENIOR CARE GROUP OF YANCEY, LLC**

STATEMENT OF RELIEF REQUESTED

The Debtors seek authorization to use cash collateral to fund operating expenses and costs of administration in these Chapter 11 cases. The Debtors believe that Fifth Third and HUD (collectively, the “**Creditors**”) may assert security interests in the Debtors’ accounts receivable and other proceeds from the business. As adequate protection for the use of cash collateral, the Debtors propose to provide the Creditors that have a lien on accounts receivable with a replacement lien on assets acquired after the Petition Date to the same extent, validity, and priority as existed on the Petition Date.

SENIOR CARE GROUP, INC. (“**Senior Care**”), respectfully request the entry of an order granting the Emergency Motion for Authority to Use Cash Collateral to Make Short-Term Advance to Senior Care Group of Yancey, LLC (the “**Motion**”). In support of its Motion, the Debtors respectfully represent as follows:

Jurisdiction

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 sought herein are §§ 105, 363, and 541 of the Bankruptcy Code and Rule 4001 of the Federal Rules of Bankruptcy Procedure.

Background

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

4. The Debtors are operating their business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

5. Senior Care is a non-profit corporation which, through its wholly-owned subsidiaries, provides residents and patients with a full spectrum of skilled nursing and long-term health care services. Through its specialized clinical staff, Senior Care provides specialized services for residents and patients with medically complex conditions and higher acuity needs, and offers a wide range of direct care services such as therapy, hospice care, Alzheimer’s, and dementia care within its portfolio of facilities. As a result of specialized services, Senior Care can obtain higher revenues per patient day from Medicare and managed care providers.

6. Senior Care has thirteen wholly-owned subsidiaries which operate nursing homes, a rehabilitation company, and a home health care facility in Florida, North Carolina, Oklahoma, and Georgia. One of the subsidiaries is Senior Care Group of Yancey, LLC which operates a facility known as “Smoky Ridge (“**Smoky Ridge**”).

7. The Court has entered orders authorizing the use of cash collateral amounts to budgets.

8. Smoky Ridge has a problem with the timing of receiving its Medicaid payment from the State of North Carolina. As a result of the state's timing for its Medicaid payment, Smoky Ridge will not receive Medicaid payments until January 3, 2018.

9. Smoky Ridge has a payroll due on December 28, 2017. Without such a short-term advance, Smoky Ridge cannot pay its employees.

10. By this Motion, Senior Care seeks authorization to advance \$70,000 to Smoky Ridge on December 27, 2017, which will be repaid on January 3, 2018.

WHEREFORE, Senior Care respectfully requests that this Court enter an order, (a) granting the Motion; (b) authorizing Senior Care to use Cash Collateral to loan to Smoky Ridge under a short-term advance; and (c) providing such other and further relief as the Court may deem appropriate.

/s/ Scott A. Stichter
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Attorneys for Debtors

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Debtors' Emergency Motion for Authority to Use Cash Collateral to Make Short-Term Advance to Senior Care Group of Yancey,

LLC has been furnished on this 21st day of December, 2017, by either the Court's CM/ECF system or by U.S. Mail to:

Office of the U.S. Trustee

1007-2 Parties in Interest Matrix

/s/ Scott A. Stichter
Scott A. Stichter

13506 (1969128)

Label Matrix for local noticing
113A-8
Case 8:17-bk-06562-CPM
Middle District of Florida
Tampa
Thu Dec 21 15:21:01 EST 2017

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End of Label Matrix
Mailable recipients 28
Bypassed recipients 0
Total 28