

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
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In re:

SCG MADILL BROOKSIDE, LLC

Chapter 11

Case No. 8:17-bk-10101-CPM

Jointly Administered with:

SCG DURANT FOUR SEASONS, LLC

Case No. 8:17-bk-10103-CPM

SCG LAKE COUNTRY, LLC

Case No. 8:17-bk-10104-CPM

SCG OAK RIDGE, LLC

Case No. 8:17-bk-10107-CPM

SCG RED RIVER, LLC

Case No. 8:17-bk-10108-CPM

SCG RED RIVER MANAGEMENT, LLC

Case No. 8:17-bk-10109-CPM

Debtors.

/

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

SCG Madill Brookside, LLC (“**Brookside**”), SCG Durant Four Seasons, LLC (“**Four Seasons**”), SCG Lake Country, LLC (“**Lake Country**”), SCG Oak Ridge, LLC (“**Oak Ridge**”), SCG Red River, LLC (“**Red River**”), and SCG Red River Management, LLC (“**Red River Management**”) (the “**Debtors**”), by and through their undersigned counsel, hereby file 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 December 5, 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**”). Pursuant to an order of this Court, the cases are being jointly administered for procedural purposes only.

4. The Debtors are operating their businesses and managing their properties as debtors in possession pursuant to §§ 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 April 4, 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 June 3, 2018.

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 July 3, 2018, and the extended 180-day period would expire on August 31, 2018.

9. The Debtors are in the process of formulating their plan and require additional time in connection with same.

10. 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 July 3, 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 August 31, 2018, without prejudice to the Debtors' rights to seek further extension; and (d) providing such other relief as is just and proper.

/s/ Elena Paras Ketchum

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Elena Paras Ketchum (FBN 0129267)
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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 3rd day of April, 2018, 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 LBR 1007-2 Parties in Interest matrix.

/s/ Elena Paras Ketchum

Elena Paras Ketchum

Label Matrix for local noticing

113A-8

Case 8:17-bk-10101-CPM

Middle District of Florida

Tampa

Tue Apr 3 14:42:32 EDT 2018

AmeriPath

Diagnostic Pathology Services

P.O. Box 849893

Dallas, TX 75284-9893

Amerisure Mutual Insurance Company -

c/o Meltzer, Purtill & Stelle LLC

300 South Wacker Drive

Suite 2300

Chicago, IL 60606-6701

Asset Protection Unit, Inc.

%Senior Health CCM of Pennsylvania

PO Box 30969

Amarillo, TX 79120-0969

BSD Care Inc.

2915 Avenue K

Brooklyn, NY 11210-4053

BSI Financial Services, as Servicing Agent f

BERGER FIRM P.A.

3050 Biscayne Blvd. - Suite 402

Miami, FL 33137-4143

Bank of America NA-Global Prod Solutions

Loan Servicing Dept CT2-BB-14

70 Batterson Park Road

Farmington, CT 06032-2580

Barbara Shipp

205 Rogers Circle

Durant, OK 74701-1728

Billy Anderson

1912 W. Elm

Durant, OK 74701-3430

Bouchard-Clearwater

P.O. Box 6090

Clearwater, FL 33758-6090

Bryan City Ambulance Authority

P.O. Box 1

Durant, OK 74702-0001

Bryan County Ambulance Authority

P.O. Box 1

Durant, OK 74702-0001

Bryan County Treasurer

323 W. Beech

Durant, OK 74701-4363

C. Craig Cole & Associates

317 NW 12th St

Oklahoma City, OK 73103-3704

C. David Garvin, M.D. P.A.

1300 Hwy 91 N

Denison, TX 75020

Centers for Medicare & Medicaid Services

Div of Premium Billing & Collections

Mail Stop: C3-11-03, PO Box 7520

Baltimore, MD 21207

D. R. Payne & Associates, Inc

119 North Robinson, #400

Oklahoma City, OK 73102-4613

DirectPath, LLC

120 18th St. South, #102

Birmingham, AL 35233-1819

Donald Hall

Rt 1 Box 273H

Madill, OK 73446

Durant Medical Supply

1400 Bryan Dr., #100

Durant, OK 74701-2156

Eclipse Networks -

100 Ashford Center North, #110

Atlanta, GA 30338-4851

Emilie T. Stahler, DDS Inc. P.C.

108 S. 2nd Ave.

Marietta, OK 73448-2671

Faith Hospice

1122 Walnut Drive West

Ardmore, OK 73401-2353

Floyd Miller

PO Box 459

Madill, OK 73446-0459

George Ladd

3002 River Oak Drive

Muskogee, OK 74403-2306

Gibbs Armstrong Borochoff

Mullican & Hart

601 South Boulder Ave., #500

Tulsa, OK 74119-1305

HD Supply Facility

P.O. Box 509058

San Diego, CA 92150-9058

Hanger Prosthetics & Orthotics

1109 Walnut Drive

Ardmore, OK 73401-2354

HealthChoice Refunds

PO Box 24110

Oklahoma City, OK 73124-0110

Heritage Company

P.O. Box 890287

Charlotte, NC 28289-0287

James Cotter
1802 NE Loop 410, #111
San Antonio, TX 78217-5204

Julie White
1712 Schooner Drive
Norman, OK 73072-3383

Kathy Brock
206 Summit Street
Marietta, OK 73448-1827

LQC Partners XI, LLC
c/o Leyza F. Blanco, Esq.
GrayRobinson, P.A.
333 SE 2nd Avenue, Suite 3200
Miami, FL 33131-2191

Lee Family Clinic, Inc.
P.O. Box 1610
Durant, OK 74702-1610

Lina Pickens
24030 Pickens Bottom Road
Madill, OK 73446-9544

Love County Treasurer
405 W. Main, #204
Marietta, OK 73448-2850

Lynette Smith
1412 Wendell Drive
Durant, OK 74701-3005

Lytle Soule & Curlee
119 North Robinson, #1200
Oklahoma City, OK 73102-4600

Marcus P. Rogers, Administrator of the Estate
Suzy Tate, P.A.
14502 North Dale Mabry Highway
Suite 200
Tampa, FL 33618-2040

Marcus P. Rogers, Administrator of the Estate
c/o Suzy Tate
14502 N. Dale Mabry Hwy., Ste. 200
Tampa, FL 33618-2040

Marshall County Treasurer
100 Plaza Suite 104
Madill, OK 73446-2273

Mary Bokies
P.O. Box 5325
Durant, OK 74702-5325

Mary Ensign
12455 South West Grand
Oklahoma City, OK 73109

Mary Vellotti
P.O. Box 986
Colbert, OK 74733-0986

Maxine Horn
13741 Oliver Road
Madill, OK 73446-3633

Medical Services of America
P.O. Box 890412
Charlotte, NC 28289-0412

Nurses Oklahoma Staffing
1512 Meadow Lane
Ardmore, OK 73401-1822

OMPS, Inc.
2007 N. Commerce, #246
Ardmore, OK 73401-1394

Oklahoma Em Phys Part PLLC
P.O. Box 732064
Dallas, TX 75373-2064

Oklahoma Secretary of State
421 N.W. 13th, #210
Oklahoma City, OK 73103-3759

Oretha Parks
2160 E. Watch Street
Springfield, IL 62702-3197

PDR Certified Public Accountants
4023 Tampa Road, #2000
Oldsmar, FL 34677-3216

Pharmcare OK of Durant
P.O. Box 70
Hydro, OK 73048-0070

PointRight Inc.
150 Cambridge Park Dr., #301
Cambridge, MA 02140-2479

Praxair Distribution Inc.
P.O. Box 120812
Dept. 0812
Dallas, TX 75312-0812

Robert E. Engles, MD
P.O. Box 818
Durant, OK 74702-0818

Ruby Wenzel
8393 Cason Road
Gladstone, OR 97027-1457

SANDRA FRITCHIE next of kin and Pers Rep the
c/o M. Eric Barksdale
Post Office Box 2090
Land O Lakes, FL 34639-2090

Shea Davis
203 Muldrow
Tishomingo, OK 73460-2717

Shirley Page
PO Box 163
Clarita, OK 74535-0163

Standley Systems
P.O. Box 460
Chickasha, OK 73023-0460

Sue McClair
465 North Park Lane
Mead, OK 73449-6323

Texoma Print Services
2712 Enterprise Blvd
Durant, OK 74701-2386

Twin Med LLC
P.O. Box 54390
Los Angeles, CA 90054-0390

TwinMed LLC
11333 Greenstone Avenue
Santa Fe Springs, CA 90670-4618

US Foods, Inc.
P.O. Box #973118
Dallas, TX 75397-3118

Unemployment Tax Control Associates Inc
Attn: Business Office
One Financial Plaza, 1350 Main St, 12th
Springfield, MA 01103

United Healthcare Insurance Company
22561 Network Place
Chicago, IL 60673-1225

Westfield Bank FSB
PO Box 551
Medina, OH 44258-0551

Wynona L. Robinson
511 Limestone Flat
San Antonio, TX 78251-4184

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(d)Westfield Bank, FSB
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Medina, OH 44258-0551

(d)Westfield Bank, FSB
PO Box 551
Medina, OH 44258-0551

(u)Note: Entries with a '+' at the end of the
name have an email address on file in CMECF

Note: Entries with a '-' at the end of the
name have filed a claim in this case

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