

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

Chapter 11

SCG MADILL BROOKSIDE, LLC

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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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

Asset Protection Unit, Inc.
%Senior Health CCM of Pennsylvania
PO Box 30969
Amarillo, TX 79120-0969

Bank of America NA-Global Prod Solutions
Loan Servicing Dept CT2-BB-14
70 Batterson Park Road
Farmington, CT 06032-2580

Bouchard-Clearwater
P.O. Box 6090
Clearwater, FL 33758-6090

Bryan County Treasurer
323 W. Beech
Durant, OK 74701-4363

Centers for Medicare & Medicaid Services
Div of Premium Billing & Collections
Mail Stop: C3-11-03, PO Box 7520
Baltimore, MD 21207

Donald Hall
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Marietta, OK 73448-2671

George Ladd
3002 River Oak Drive
Muskogee, OK 74403-2306

Hanger Prosthetics & Orthotics
1109 Walnut Drive
Ardmore, OK 73401-2354

AmeriPath
Diagnostic Pathology Services
P.O. Box 849893
Dallas, TX 75284-9893

BSD Care Inc.
2915 Avenue K
Brooklyn, NY 11210-4053

Barbara Shipp
205 Rogers Circle
Durant, OK 74701-1728

Bryan City Ambulance Authority
P.O. Box 1
Durant, OK 74702-0001

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317 NW 12th St
Oklahoma City, OK 73103-3704

D. R. Payne & Associates, Inc
119 North Robinson, #400
Oklahoma City, OK 73102-4613

Durant Medical Supply
1400 Bryan Dr., #100
Durant, OK 74701-2156

Faith Hospice
1122 Walnut Drive West
Ardmore, OK 73401-2353

Gibbs Armstrong Borochoff
Mullican & Hart
601 South Boulder Ave., #500
Tulsa, OK 74119-1305

HealthChoice Refunds
PO Box 24110
Oklahoma City, OK 73124-0110

Amerisure Mutual Insurance Company -
c/o Meltzer, Purtill & Stelle LLC
300 South Wacker Drive
Suite 2300
Chicago, IL 60606-6701

BSI Financial Services, as Servicing Agent f
BERGER FIRM P.A.
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Miami, FL 33137-4143

Billy Anderson
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P.O. Box 1
Durant, OK 74702-0001

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DirectPath, LLC
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Birmingham, AL 35233-1819

Eclipse Networks -
100 Ashford Center North, #110
Atlanta, GA 30338-4851

Floyd Miller
PO Box 459
Madill, OK 73446-0459

HD Supply Facility
P.O. Box 509058
San Diego, CA 92150-9058

Heritage Company
P.O. Box 890287
Charlotte, NC 28289-0287

Humana Health Care Plans
PO Box 931655
Atlanta, GA 31193-1655

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3029 Prestonwood Circle
Durant, OK 74701-2555

Jaiswal Consulting Inc.
3714 Lionel Lane
Durant, OK 74701-5073

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Miami, FL 33131-2191

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P.O. Box 1610
Durant, OK 74702-1610

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Marietta, OK 73448-2850

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Oklahoma City, OK 73102-4600

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Suzy Tate, P.A.
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Tampa, FL 33618-2040

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c/o Suzy Tate
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Tampa, FL 33618-2040

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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

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Gladstone, OR 97027-1457

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Land O Lakes, FL 34639-2090

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Standley Systems
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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
P O Box 551
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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Bypassed recipients 3
Total 76