

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	
)	Case No. 17-70646 JAD
Lifestat Ambulance Service, Inc.,)	
)	Chapter 11
Debtor)	Docket No.
)	
)	
Lifestat Ambulance Service, Inc.,)	
)	
Movant)	
)	
vs.)	
)	
No Respondents)	

**MOTION FOR EXTENSION OF TIME TO FILE CHAPTER 11 PLAN AND
DISCLOSURE STATEMENT AND TO EXTEND
DEBTOR'S EXCLUSIVITY PERIOD**

AND NOW, come the Debtor, Lifestat Ambulance Service, Inc., by and through Counsel, Christopher M. Frye, and respectfully represent as follows:

1. This case was commenced on August 16, 2017 when the Debtor filed a voluntary petition under Chapter 11 of the Bankruptcy Code.
2. The deadline for the Debtor to file a Chapter 11 Plan and Disclosure expires on February 27, 2018 pursuant to the Agreed Scheduling Order dated September 18, 2017.
3. The Debtor continues to operate as a Debtor in possession and continues to meet the operating requirements of a Chapter 11 Debtor.
4. The Debtor has filed monthly financial reports for each month of the Chapter 11 proceeding up through December 2017. The Debtor is still

preparing the report for January 2018 and that report will be filed imminently.

5. The Debtor has paid all US Trustee fees as they have come due since the filing of the Chapter 11 case.
6. The Debtor continues to honor the cash collateral agreement with First National Bank of PA and CAN Capital Asset Servicing, Inc.
7. The Debtor desires to file a consensual plan with secured creditors but needs more time in order to negotiate and prepare a feasible Chapter 11 Plan.
8. Since reaching an agreement with respect to cash collateral with First National Bank of PA and CAN Capital Asset Servicing, Inc., no creditors or parties in interest have taken a position adverse to allowing the Debtor to continue to operate while it continues to reorganize and ultimately file a Chapter 11 Plan.
9. No creditors or parties in interest will be prejudiced by extending the time to file a Chapter 11 Plan and Disclosure Statement by approximately 60 days until April 30, 2018.
10. The Debtor is a "Small Business" as defined in 11 U.S.C. Section 101(51D) and (51C).
11. As a Small Business, the Debtor's exclusivity period to file a Chapter 11 Plan and Disclosure Statement expires on February 27, 2018.
12. Based on the foregoing, no creditors or parties in interest will be prejudiced by extending the Debtor's exclusivity period to file a Chapter

11 Plan and Disclosure Statement by approximately 60 days until April 30, 2018.

WHEREFORE, the Debtor, Lifestat Ambulance Service, Inc., respectfully requests this Honorable Court to enter and Order extending the time to file a Chapter 11 Plan and Disclosure Statement and to extend the exclusivity period to file a Chapter 11 Plan and Disclosure Statement in this case until April 30, 2018.

Respectfully submitted,

February 27, 2018
DATE

/s/ Christopher M. Frye
Christopher M. Frye, Esquire
Counsel for the Debtor

STEIDL & STEINBERG
Suite 2830 – Gulf Tower
Pittsburgh, PA 15219
(412) 391-8000
Chris.frye@steidl-steinberg.com
PA I. D. No. 208402