

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Case No. 17-31653
	§	
Gulf Coast Hospice of Houston, Ltd.,	§	Chapter 11
	§	
Debtor	§	

**MOTION FOR ORDER PURSUANT TO
BANKRUPTCY CODE §1121 EXTENDING
DEBTOR’S EXCLUSIVE PERIODS TO FILE A PLAN
OF REORGANIZATION AND SOLICIT ACCEPTANCES THEREOF**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Gulf Coast Hospice of Houston, Ltd., (“Debtor” and “Debtor in Possession”) in the above-captioned Chapter 11 case, and files this Motion for Order Pursuant to Bankruptcy Code §1121 Extending Debtor’s Exclusive Periods to file a Plan of Reorganization and Solicit Acceptances thereof (the “Motion”). Debtor seeks to extend the exclusive filing period to December 13, 2017, and extend the exclusive solicitation period to March 13, 2018.

Jurisdiction and Venue

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§157 and 1334. This is a core proceeding pursuant to 28 U.S.C. §157(b).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§1408 and 1409.
3. On March 17, 2017 (the “Petition Date”), Gulf Coast Hospice of Houston, Ltd. filed for relief under Chapter 11, Title 11 of the United States Code, 11 U.S.C. §101, *et seq.* (the “Bankruptcy Code”) in the United States District Court for the Southern District of Texas, Houston Division (the “Bankruptcy Court”).
4. Debtor continues to manage its assets as a Debtor in Possession under sections 1107(a) and 1108 of the Bankruptcy Code. No Trustee or examiner has been appointed and no official committee of creditors has been formed.

General Background

5. Gulf Coast Hospice is a Texas limited partnership and operates as a hospice care agency in the Houston area. Though the company experienced a reduction of business over the past several months, the organization remains operational and expects to continue operations now that the business is gradually increasing.
6. No Trustee or examiner has been appointed and no official committee of creditors has been formed.

Relief Requested

7. Bankruptcy Code Section 1121(b) provides for an initial 120-day period after the Petition Date within which the Debtor has the exclusive right to file a Chapter 11 Plan of Reorganization. Bankruptcy Code Section 1121(c) further provides for an initial 180-day period

after the Petition Date within which the Debtor has the exclusive right to solicit and obtain acceptances of a Plan of Reorganization if a Plan has been filed during the first 120-day period.

8. Debtor requests, pursuant to Section 1121(d) of the Bankruptcy Code, entry of an order extending the exclusive filing period for 90 days to December 13, 2017 and the exclusive solicitation period for 90 days to March 13, 2018 for cause, without prejudice to Debtor's right to seek further extensions of the exclusive periods.

No Prior Request

9. No previous request for the relief sought herein has been made to this Court or any other court.

Conclusion

WHEREFORE, Debtor respectfully requests that the Court enter an Order Pursuant to Bankruptcy Code Section 1121 Extending Debtor's Exclusive Periods to file a Plan of Reorganization and Solicit Acceptances thereof in this case.

Respectfully submitted,

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