

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>  <b>NEIGHBORS LEGACY HOLDINGS, INC.,</b> <i>et al.,</i>  <b>Debtors.<sup>1</sup></b>	§ § § § § §	<b>Chapter 11</b>  <b>Case No. 18-33836 (MI)</b>  <b>(Jointly Administered)</b> <b>(Emergency Hearing Requested)</b>
---	----------------------------	---

**REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN “FIRST DAY” MATTERS**

On July 12, 2018, Neighbors Legacy Holdings, Inc. and certain of its affiliates (the “Debtors”) each filed petitions for relief under Chapter 11 of the Bankruptcy Code. Counsel for the debtors believes that these cases qualify as “Complex Chapter 11 Cases.” The Debtors need emergency consideration of the following initial case matters:

- X** Debtors’ Emergency Application to Employ Kurtzman Carson Consultants LLC as Claims Noticing and Solicitation Agent, Nunc Pro Tunc to the Petition Date [Docket No. 4].
- X** Debtors’ Emergency Motion for an Order (I) Approving Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures to Resolve Objections, and (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service [Docket No. 6].
- X** Debtors’ Emergency Motion for Interim and Final Orders Authorizing the Debtors to (i) Continue Operating their Cash Management System, (ii) Honor Certain Prepetition Obligations, (iii) Maintain Existing Business Forms, and (iv) Granting Related Relief [Docket No. 9].
- X** Debtors’ Emergency Motion for an Order Authorizing the Implementation of Procedures to Protect Confidential Patient Information [Docket No. 11]

---

<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at [www.kccllc.net/neighbors](http://www.kccllc.net/neighbors). The location of Debtors’ principal place of business and the Debtors’ service address is: 10800 Richmond Avenue, Houston, Texas 77042.

- X Debtors' (A) Emergency Motion for Interim and Final Orders Authorizing the Use of Cash Collateral, Granting Adequate Protection to Prepetition Secured Parties, and Scheduling a Final Hearing Pursuant to Bankruptcy Rule 4001; and (B) Motion for Final Order Authorizing Secured Post-Petition Financing on a Priming and Super Priority Basis [Docket No. 12]
  
- X Debtors' Emergency Motion for Interim and Final Orders Authorizing (I) the Debtors to Pay Prepetition Workforce Obligations and Continue Certain Workforce Benefit Programs and (II) Authorizing Banks and Financial Institutions to Honor Prepetition Checks for Payment of the Prepetition Obligations [Docket No. 13]
  
- X Debtors' Emergency Motion to (I) Extend the Time to File Schedules and Statements of Financial Affairs, (II) Authorize the Debtors to File a Consolidated List of Their 50 Largest Unsecured Creditors, and (III) Waive the Requirement that Each Debtor File a List of Creditors [Docket No. 15].

Dated: July 12, 2018

PORTER HEDGES LLP

By: /s/ John F. Higgins

John F. Higgins  
State Bar No. 09597500  
Eric M. English  
State Bar No. 24062714  
Genevieve M. Graham  
State Bar No. 24085340  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
Telephone: (713) 226-6000  
Fax: (713) 226-6248

*Proposed Counsel for Debtors and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Request for Emergency Consideration of Certain "First Day" Matters was served by electronic mail through this Court's electronic case filing system on all of the parties appearing in this case this 12th day of July, 2018.

/s/ John F. Higgins

John F. Higgins