

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

_____	X	
In re	:	
	:	Chapter 11
HOSPITAL FOR SPECIAL SURGERY, LLC	:	
<i>Db</i> a ONECORE HEALTH,	:	Case No. 24-12862-JDL
	:	
Debtor.	:	
_____	X	

**DEBTOR’S EMERGENCY APPLICATION (I) FOR EXPEDITED HEARING
AND (II) TO SHORTEN TIME TO RESPOND TO DISCLOSURE MOTION**

Hospital for Special Surgery, LLC *dba* OneCore Health (“OneCore” or “Debtor”) hereby submits this emergency application (the “Application”) for entry of an order, substantially in the form submitted contemporaneously herewith (the “Proposed Order”), pursuant to rule 9006 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and rule 9006-1 of the Local Bankruptcy Rules for the Western District of Oklahoma (the “Local Rules”), (i) shortening the time to respond to *Debtor’s Motion for an Order (I) Approving the Disclosure Statement, (II) Establishing a Voting Record Date, (III) Approving Solicitation Packages and Solicitation Procedures, (IV) Approving the Forms of Ballots, (V) Establishing Voting and Tabulation Procedures, and (VI) Establishing Notice and objection Procedures for the Confirmation of the Plan* [Dkt. No. ___] (the “Motion”) to **5:00 p.m. prevailing Central Time on April 9, 2025**, and (ii) setting such Motion and the conditional approval of the related *Disclosure Statement* [Dkt. No. ___] for an expedited hearing (the “Hearing”) on **April 16, 2025 at 11:00 a.m. prevailing Central Time**. In support of this Application, Debtor respectfully states as follows:



1. Absent a shortening of time, Debtor would be required to provide twenty-eight days' notice of opportunity for hearing on the Motion. Debtor's exit financing depends, for its certainty, upon a more rapid confirmation of its proposed chapter 11 plan than would occur pursuant to standard notice periods. Accordingly, Debtor respectfully requests that the notice period be shortened to fourteen (14) days.

2. No prior applications with respect to the Disclosure Motion have been made.

3. Due to the exigencies of circumstances and the large creditor body, Debtor respectfully submits that it would not be feasible to solicit the consent of the creditor body prior to filing this Application.

4. Debtor further requests that an expedited hearing be set, so that, in the event objections are filed, a determination of the Motion promptly may be made.

Notice

5. No creditors' committee, trustee, or examiner has been appointed in this Chapter 11 Case. Notice of this Application is being provided to (i) the Distribution Service List and (ii) any other party that has requested notice pursuant to Bankruptcy Rule 2002. Debtor submits that, in light of the expedited nature of the relief requested and the harm to Debtor, its estate and creditors, if the relief requested is not granted on an *ex parte* basis, no other or further notice need be provided.

Conclusion

WHEREFORE, for the reasons set forth herein, Debtor respectfully requests that the Court (a) enter the Proposed Order and (b) grant such other and further relief as is just and proper.

Dated: March 25, 2025

Respectfully submitted,

ONECORE

/s/Craig M. Regens _____

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