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

In re

Chapter 11

HOSPITAL FOR SPECIAL SURGERY, LLC

Dba ONECORE HEALTH,

Debtor.

## DEBTOR'S EMERGENCY APPLICATION (I) FOR EXPEDITED HEARING AND (II) TO SHORTEN TIME TO OBJECT TO CHAPTER 11 PLAN OF REORGANIZATION OF HOSPITAL FOR SPECIAL SURGERY, LLC <u>dba ONECORE HEALTH</u>

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 object to the *Chapter 11 Plan of Reorganization of Hospital for Special Surgery, LLC dba OneCore Health* [Dkt. No. \_\_] (the "Plan") to 5:00 p.m. prevailing Central Time on May 5, 2025, and (ii) setting the hearing on confirmation of the Plan for an expedited hearing (the "Hearing") on May 13, 2025 at 10:00 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 Plan. Debtor's exit financing depends, for its certainty, upon a more rapid confirmation of its proposed chapter 11 plan than would occur



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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 Plan 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, confirmation of the Plan promptly may occur.

**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: April 16, 2025

Respectfully submitted,

**ONECORE** 

/s/Craig M. Regens

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