

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:)	CHAPTER 11
)	
REGIONAL HOUSING & COMMUNITY SERVICES CORPORATION,)	CASE NO. 21- 41034
_____)	
IN RE:)	
)	
RHCSC COLUMBUS AL HOLDINGS LLC,)	CASE NO. 21- 41035
_____)	
IN RE:)	
)	
RHCSC COLUMBUS HEALTH HOLDINGS LLC,)	CASE NO. 21- 41036
_____)	
IN RE:)	
)	
RHCSC DOUGLAS AL HOLDINGS LLC,)	CASE NO. 21- 41037
_____)	
IN RE:)	
)	
DOUGLAS HEALTH HOLDINGS LLC,)	CASE NO. 21- 41038
_____)	
IN RE:)	
)	
GAINESVILLE AL HOLDINGS LLC,)	CASE NO. 21- 41049
_____)	
IN RE:)	
)	
GAINESVILLE HEALTH HOLDINGS LLC,)	CASE NO. 21- 41050
_____)	
IN RE:)	
)	
MONTGOMERY I AL HOLDINGS LLC,)	CASE NO. 21- 41039
_____)	
)	



IN RE:)	
)	
MONTGOMERY I HEALTH HOLDINGS LLC,)	CASE NO. 21- 41040
_____)	
IN RE:)	
)	
MONTGOMERY II AL HOLDINGS LLC,)	CASE NO. 21- 41041
_____)	
IN RE:)	
)	
MONTGOMERY II HEALTH HOLDINGS LLC,)	CASE NO. 21- 41043
_____)	
IN RE:)	
)	
ROME AL HOLDINGS LLC,)	CASE NO. 21- 41032
_____)	
IN RE:)	
)	
ROME HEALTH HOLDINGS LLC,)	CASE NO. 21- 41033
_____)	
IN RE:)	
)	
SAVANNAH AL HOLDINGS LLC,)	CASE NO. 21- 41044
_____)	
IN RE:)	
)	
SAVANNAH HEALTH HOLDINGS LLC,)	CASE NO. 21- 41046
_____)	
IN RE:)	
)	
SOCIAL CIRCLE AL HOLDINGS LLC,)	CASE NO. 21- 41047
_____)	
IN RE:)	
)	
SOCIAL CIRCLE HEALTH HOLDINGS LLC,)	CASE NO. 21- 41048
)	
Debtors.)	

MOTION FOR JOINT ADMINISTRATION

COME NOW the above-captioned debtors and debtors and debtors-in-possession (collectively, the “**Debtors**”)¹, pursuant to Federal Rule of Bankruptcy Procedure 1015, and file this their Motion for Joint Administration of their Chapter 11 cases and respectfully show the Court as follows:

1.

Each Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”) on August 26, 2021. The Debtors each remain in possession and control of their estates pursuant to 11 U.S.C. §§1107 and 1108.

2.

All seventeen (17) cases have been assigned to the Honorable Paul W. Bonapfel.

3.

The Debtors request that their bankruptcy cases be jointly administered by the Court such that a single docket is utilized for matters relating to the administration of the estates. The Debtors request that separate files be maintained for proofs of claim.

4.

The proposed style of the procedurally consolidated cases is as follows:

¹ The Debtors in these chapter 11 cases include: Regional Housing & Community Services Corporation, RHCSC Columbus AL Holdings LLC, RHCSC Columbus Health Holdings LLC, RHCSC Douglas AL Holdings LLC, RHCSC Douglas Health Holdings LLC, RHCSC Gainesville AL Holdings LLC, RHCSC Gainesville Health Holdings LLC, RHCSC Montgomery I AL Holdings LLC, RHCSC Montgomery I Health Holdings LLC, RHCSC Montgomery II AL Holdings LLC, RHCSC Montgomery II Health Holdings LLC, RHCSC Rome AL Holdings LLC, RHCSC Rome Health Holdings LLC, RHCSC Savannah AL Holdings LLC, RHCSC Savannah Health Holdings LLC, RHCSC Social Circle AL Holdings LLC, and RHCSC Social Circle Health Holdings LLC.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:) **CHAPTER 11**
)
REGIONAL HOUSING & COMMUNITY)
SERVICES CORP., et al.,) **Jointly Administered Under**
) **CASE NO. 21-41034-pwb**
)
Debtors.)
)
5.

The Debtors request that all pleadings, notices, orders or other papers, other than proofs of claim, for any of the Debtors be filed in a single original and entered on a single docket, under the Case Number assigned for Regional Housing & Community Services Corp.

6.

The Debtors do not request substantive consolidation at this time.

7.

The Debtors are not aware of any administrative or scheduling orders entered in any of the cases which would require modification.

8.

The Debtors believe that creditors of the estates will not be prejudiced by joint administration of these cases, and that such administration is in the best interests of all creditors and parties in interest because it will reduce the costs of administration.

WHEREFORE, the Debtors request that for ease of administration, convenience and economy, the Court enter an order for the joint administration of these cases, and provide such other and further relief as may be just and proper.

This 27th day of August, 2021.

Respectfully submitted,

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