

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

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

**MOTION FOR ADDITIONAL TIME TO FILE SCHEDULES
AND STATEMENTS OF FINANCIAL AFFAIRS**

COME NOW the above-captioned debtors and debtors and debtors-in-possession (collectively, the “**Debtors**”)¹, in the above-styled proposed jointly administered case (the “**Case**”), by and through the undersigned counsel, and file this Motion, respectfully showing the Court as follows:

Relief Requested

1.

By this Motion, the Debtors respectfully request the entry of an order, pursuant to Federal Rule of Bankruptcy Procedure 1007(c) (the “**Bankruptcy Rules**”), extending the time to file their schedules and statements of financial affairs through and including September 30, 2021.

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.



Jurisdiction

2.

This Court has jurisdiction to consider this Motion pursuant to 28 U.S.C. § 1334. Consideration of this Motion is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Background

3.

On August 26, 2021, (the “**Petition Date**”), the Debtors each filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”). The Debtors are authorized to operate their businesses as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

4.

No request has been made for the appointment of a trustee or examiner, and no committee has been appointed in this Case.

5.

Additional information about the Debtors’ businesses and the events leading up to the Petition Date can be found in the Declaration of Katie Goodman in Support of First Day Applications and Motions (the “**Goodman Declaration**”) which is incorporated herein by reference.

Basis for Relief

6.

Pursuant to Bankruptcy Rule 1007, the Debtors’ Chapter 11 Petitions were accompanied by a list of the Debtors’ creditors, containing the name and address of each as then known, and by a separate list of the Debtor’s 30 largest unsecured creditors on a consolidated basis, as then

known, excluding insiders and governmental units, as prescribed by Official Form No. 9. The further schedules, statements and lists prescribed by Bankruptcy Rule 1007 were not filed with the Petition.

7.

Bankruptcy Rule 1007 has provided an automatic extension until September 9, 2021, for the filing of Debtors' remaining schedules, statements and lists. However, given the urgency of other matters which will require the attention of Debtors' representatives in this case, the Debtors believe that they will be unable to compile all the information necessary for the preparation and filing of schedules and statements of financial affairs by September 9, 2021. Bankruptcy Rule 1007(c) does, however, permit extensions, for cause, of this fourteen (14) day deadline.

8.

To prepare the schedules and statements, the Debtors must gather information from books, records, and documents relating to a multitude of transactions. The Debtors began the process of compiling information to prepare schedules prior to the Petition Date and are currently working diligently to assemble and collect the necessary information. Nevertheless, the Debtors will need additional time to complete this process. For these reasons, the Debtors believe cause exists to extend the time for filing their schedules and statements of financial affairs. The Debtors anticipates that they will need through and including September 30, 2021 in which to prepare and file schedules and statements of financial affairs in the appropriate format.

9.

Such a request is not unusual in large Chapter 11 cases, and similar relief has been granted in other large Chapter 11 cases. See, e.g., In re Hutcheson Medical Center, Inc., et al., Case No. 14-42863 (Bankr. N.D. Ga. December 5, 2014) (Bonapfel, J.); In re Beaulieu Group,

LLC, et al., Case No. 17-41677 (jointly administered) (Bankr. N.D. Ga. July 20, 2017) (Diehl, J.); In re P-D Valmiera Glass USA Corp., Case No. 19-59440 (Bankr. N.D. Ga. June 26, 2019) (Bonapfel, J.); In re Virginia-Highland Restaurant, LLC and Restaurant 104 LLC, Case No. 20-70718 (jointly administered) (Bankr. N.D. Ga. October 26, 2020) (Ellis-Monro, J.).

Notice

10.

Notice of this Motion has been provided to the Office of the United States Trustee, counsel to the Debtors' pre-petition secured lender, counsel to the Debtors' proposed debtor-in-possession lender, any other party asserting a security interest in assets of the Debtors, and the Debtors' thirty (30) largest unsecured creditors on a consolidated basis. In light of the nature of the relief requested, the Debtors submit that no further notice is necessary.

Conclusion

WHEREFORE, the Debtors respectfully requests that this Court:

- (a) enter an order extending the deadline for filing schedules and statements of financial affairs through and including September 30, 2021; and
- (b) grant the Debtors such other and further relief as is just and proper.

This 27th day of August, 2021.

Respectfully submitted,

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