UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE:	)	
	)	Case No. 18-07762-JJG-11
FAYETTE MEMORIAL HOSPITAL	)	
ASSOCIATION, INC. d/b/a FAYETTE	)	
REGIONAL HEALTH SYSTEMS,	)	
Debtor.	)	
	)	

DEBTOR'S LIMITED OBJECTION TO HOSPITAL CARE CONSULTANTS' APPLICATION FOR ADMINISTRATIVE PRIORITY CLAIM PURSUANT TO 11 U.S.C. § 503(b)(1)

Fayette Memorial Hospital Association, Inc., d/b/a Fayette Regional Health Systems ("**Fayette**" or the "**Debtor**") by the undersigned counsel, hereby files its limited objection to *Hospital Care Consultants' [Amended] Application for Administrative Priority Claim Pursuant to 11 U.S.C. § 503(b)(1)* [DN 523] (the "**HCC Claim**") filed by Hospital Care Consultants, Inc., ("**HCC**") and states as follows:

1. On October 10, 2018 (the "**Petition Date**"), the Debtor filed a voluntary petition in this Court for reorganization relief under Chapter 11 of Title 11 of the United States Code (the "**Bankruptcy Code**").

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue of this case and this Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

3. On August 28, 2019, HCC filed the HCC Claim seeking allowance and payment of an administrative expense claim in the amount of $83,703.97 due and owing pursuant to the terms of a Coverage Services Agreement.

4. Upon review of the invoices supporting the HCC Claim, the Debtor does not dispute the claimed amount of $83,703.97.

5. However, the Debtor has no current authorization to use cash collateral, and the Debtor is in the process of reconciling all administrative expense claims in this case to determine the sufficiency of remaining assets to satisfy such claims.

6. The Debtor therefore requests that to the extent the HCC Claim is allowed, payment of the allowed HCC Claim should be made only upon further order of the Court at a time when other similarly situated administrative expense claims are paid.

WHEREFORE, the Debtor respectfully requests the Court enter an Order providing that the allowed administrative expense claim of HCC shall be paid only upon further order of the Court and at a time when other similarly situated administrative expense claims are paid.

Respectfully submitted this 24th day of September, 2019,

/s/ Wendy D. Brewer

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Limited Objection* was filed electronically this 24th day of September, 2019. Notice of this filing will be sent to all parties registered to receive such notice by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

/s/ Wendy D. Brewer
Wendy D. Brewer (#22669-49)