UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**	
Caption in Compliance with D.N.J. LBR 9004-2(c) **WASSERMAN, JURISTA & STOLZ, P.C.** **110 Allen Road, Suite 304** **Basking Ridge, NJ 07920** **Phone: (973) 467-2700** **Fax: (973) 467-8126** **Counsel to Debtor-in-Possession** **LEONARD C. WALCZYK**	
In Re: **FLORHAM PARK SURGERY CENTER, LLC,** Debtor.	Case No.: 16-16964(JKS) Judge: John K. Sherwood Chapter: 11

APPLICATION FOR EXPEDITED CONSIDERATION OF FIRST DAY MATTERS

On April 11, 2016, Florham Park Surgery Center, LLC filed a petition for relief under Chapter 11 of the Bankruptcy Code.

Counsel for the Debtor requests that the following relief be provided on a first day basis (check those that apply):

1. ____ MOTION SEEKING THE JOINT ADMINISTRATION OF MULTIPLE DEBTOR BANKRUPTCY CASES.

2. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR AN EXTENSION OF TIME WITHIN WHICH TO FILE STATEMENTS AND SCHEDULES.

3. ____ MOTION FOR AN ORDER AUTHORIZING THE EMERGENCY OR INTERIM USE OF CASH COLLATERAL OR DEBTOR-IN-POSSESSION FINANCING PENDING THE NOTICING AND SCHEDULING OF AN INTERIM OR FINAL HEARING FOR FINANCING PURSUANT TO BANKRUPTCY CODE §§ 363 AND 364 AND FED. R. BANKR. P. 4001.

4. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MAINTAIN EXISTING BANK ACCOUNTS AND BUSINESS FORMS AND CASH MANAGEMENT PROCEDURES PROVIDING THE UNITED STATES TRUSTEE'S OFFICE WITH A 60 DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOMES A FINAL ORDER.

5. ____ MOTION FOR AN ORDER AUTHORIZING A DEBTOR TO MODIFY THE INVESTMENT GUIDELINES SET FORTH IN BANKRUPTCY CODE § 345 ON AN INTERIM BASIS, PROVIDING THE UNITED STATES TRUSTEE'S OFFICE AND ANY OTHER PARTIES-IN-INTEREST A 60-DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOME A FINAL ORDER.

6. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE-PETITION WAGES, SALARIES, COMPENSATION, EMPLOYEE BENEFITS AND REIMBURSABLE BUSINESS EXPENSES UP TO THE LIMITS SET FORTH IN BANKRUPTCY CODE § 507(a).

7. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE- PETITION SALES, USE, PAYROLL AND OTHER TAXES THAT ARE OTHERWISE PRIORITY CLAIMS UNDER BANKRUPTCY CODE § 507.

8. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE CREDIT CARD FACILITIES.

9. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO HONOR CERTAIN PRE-PETITION CUSTOMER OBLIGATIONS, DEPOSITS, REBATES, ETC.

10. ____ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE WITH AND PAY PRE-PETITION OUTSTANDING AMOUNTS DUE ON VARIOUS INSURANCE POLICIES.

11. ____ MOTION FOR AN ORDER AUTHORIZING PAYMENT OF OUTSTANDING AND UNPAID PRE-PETITION DEBT TO CERTAIN VENDORS WHO PROVIDE CRITICAL AND NECESSARY SERVICES AND/OR PRODUCTS TO THE DEBTOR.

12. ✓___ MOTION FOR AN ORDER PURSUANT TO BANKRUPTCY CODE § 366 REGARDING ADEQUATE ASSURANCE FOR THE FUTURE PERFORMANCE FOR UTILITIES AND ESTABLISHING PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE.

13. ✓___ MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO RETAIN A CLAIMS AND NOTICING AGENT.

14. ____ MOTION FOR AN ORDER ESTABLISHING NOTICING PROCEDURES.

15. ✓___ MOTION FO AN ORDER TO ASSUME MANAGEMENT SERVICES AGREEMENT.

April 19, 2016

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NOTE: Each motion or application for which expedited consideration is requested shall be filed with the Clerk of the U.S. Bankruptcy Court For The District Of New Jersey and served upon the United States Trustee and all affected parties.