

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

IN RE:)
)
HUTCHESON MEDICAL CENTER, INC.) CHAPTER 11
and HUTCHESON MEDICAL DIVISION,) Jointly Administered Under
INC.,) CASE NO. 14-42863-pwb
)
)
Debtors.

**REQUEST FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. § 503**

COMES NOW the claimant identified below and hereby requests the allowance of an administrative expense claim pursuant to Section 503 of the Bankruptcy Code, arising from November 20, 2014 through November 20, 2015, showing the following:

CLAIMANT'S NAME AND ADDRESS: Celtic Leasing Corp.
4 Park Plaza, Suite 300
Irvine, CA 92614

Amount of 11 U.S.C. § 503 Administrative Expense \$113,935.28

1. The undersigned holds an administrative expense claim pursuant to 11 U.S.C. § 503 in the amount identified above against the following Debtor identified in these bankruptcy cases:

- Hutcheson Medical Center, Inc.
- Hutcheson Medical Division, Inc.

2. The consideration for this debt (or ground for this liability owed by the Debtor is as follows:

Unpaid post-petition lease payments on four lease schedules. See documents attached to Motion to Compel Assumption or Rejection of Executory Leases, (Doc 165-1) and Consent Order entered May 13, 2015 (Doc. 207) and Exhibit "A" to this Request.

3. The administrative expense is entitled to administrative priority under 11 U.S.C. § 503(b) and 11 U.S.C. § 507(a)(2) because: Pursuant to 11 U.S.C. Section 365(d)(5) and case law. Claimant is entitled to an administrative priority claim.

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BMC GROUP

Hutcheson Med POC
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3. A copy of the writing (invoice, purchase order, lease agreement, etc.) on which the administrative expense is founded, if any, is attached hereto or cannot be attached for the reason set forth in the statement attached hereto.


4. The amount of all payments on the administrative expense have been credited and deducted for the purpose of making this request.

5. The undersigned is aware that under 18 U.S.C. §§ 152 and 3571, the penalty for presenting a fraudulent claim in a bankruptcy case includes a fine of up to \$500,000 or imprisonment for up to five years, or both.

WHEREFORE, the undersigned requests that the Court allow the administrative expense or expenses requested herein, to be paid in accordance with the priorities set forth in the Bankruptcy Code and based upon availability of funds.

Dated: March 3, 2016

Name of Claimant: Celtic Leasing Corp.

Signed: 

By (if appropriate): Alan I. Seitman, Esq.

As Its (if appropriate): Attorney

INSTRUCTIONS:

Mail the completed form by March 7, 2016, to the Clerk, United States Bankruptcy Court, Northern District of Georgia, Room 339, 600 East First Street, Rome, Georgia 30161, with a copy served on Trustee's Claims Agent: (i) if by overnight or hand delivery: BMC Group, Attn: Hutcheson Medical Center, Inc. Claims Processing, 300 Continental Blvd., #570, El Segundo, CA 90245; (ii) if by first class mail: BMC Group, Attn: Hutcheson Medical Center, Inc. Claims Processing, PO Box 90100, Los Angeles, CA 90009.

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

IN RE:) CHAPTER 11
)
HUTCHESON MEDICAL CENTER, INC. and) Jointly Administered Under
HUTCHESON MEDICAL DIVISION, INC.) CASE NO. 14-42863-PWB
)
Debtors.)

CERTIFICATE OF SERVICE

I, Alan I. Seitman, of 6445 Powers Ferry Road, N.W., Suite 265, Atlanta, Georgia 30339 certify that I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the 3rd day of March, 2016, I served a copy of the within CELTIC LEASING CORP.'S REQUEST FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM PURSUANT TO 11 U.S.C. SECTION 503 on the Chapter 11 Trustee's Claims Agent, via Federal Express overnight delivery, as follows:

BMC Group
Attn: Hutcheson Medical Center, Inc. Claims Processing
300 Continental Blvd., #570
El Segundo, CA 90245

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: March 3, 2016 BY: /s/ ALAN I. SEITMAN
Date ALAN I. SEITMAN, Bar No. 634850
Attorney for Celtic Leasing Corp.

6445 Powers Ferry Road, Ste. 265
Atlanta, GA 30339
alan@seitmanlaw.com
(770) 432-0547

HUTCHESON MEDICAL CENTER, INC. and
HUTCHESON MEDICAL DIVISION, INC.
CHAPTER 11
CASE NO. 14-42863-PWB

ATTACHMENT TO CELTIC LEASING CORP.'S
REQUEST FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE
CLAIM PURSUANT TO 11 U.S.C. SECTION 503

Post-petition lease payments due on Schedules 9A01 and 9A02: 5 Payments at \$18,350.00/month (See Doc. 165-1)	\$ 91,750.00
Post-petition lease payments and late fees (7/15 – 11/15) due on Schedule 9A03 per Court Order entered May 13, 2015 (See Doc. 165-1, Doc. 207 and breakdown of amounts owed)	\$ 8,314.24
Post-petition lease payments and late fees (7/15 – 11/15) due on Schedule 9A04 per Court Order entered May 13, 2015 (See Doc. 165-1, Doc. 207 and breakdown of amounts owed)	\$ 13,871.04
TOTAL DUE	\$113,935.28

EXHIBIT "A"

Hutcheson Medical Center			
0000009-A/03			
Invoice	Due	Description	Amount
134687	7/1/2015	Late Fee	\$921.18
136574	9/1/2015	Rent	\$2,362.00
137896	10/1/2015	Late Fee	\$153.53
		Rent	\$2,362.00
138955	11/1/2015	Late Fee	\$153.53
		Rent	\$2,362.00
139997	12/1/2015	Late Fee	\$614.12
		Rent	\$2,362.00
141341	1/1/2016	Late Fee	\$614.12
		Rent	\$2,362.00
TOTAL			\$14,266.48

Hutcheson Medical Center			
0000009-A/04			
Invoice	Due	Description	Amount
134688	7/1/2015	Late Fee	\$248.50
134788	7/1/2015	Late Fee	\$993.98
135843	8/1/2015	Rent	\$198.34
		Late Fee	\$248.50
136575	9/1/2015	Rent	\$3,823.00
		Late Fee	\$107.86
137897	10/1/2015	Rent	\$3,823.00
		Late Fee	\$356.36
138956	11/1/2015	Rent	\$3,823.00
		Late Fee	\$248.50
139998	12/1/2015	Rent	\$3,823.00
		Late Fee	\$1,209.70
141342	1/1/2016	Rent	\$3,823.00
		Late Fee	\$1,101.86
TOTAL			\$23,828.60