

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

RECEIVED
MAR 07 2016
BMC GROUP

IN RE:

HUTCHESON MEDICAL CENTER, INC.

And HUTCHESON MEDICAL DIVISION,

INC.,

Debtors.

CHAPTER 11

Jointly Administered Under

CASE NO. 14-42863-pwb

REQUEST FOR ALLOWANCE AND PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIM PUSUANT 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 30, 2015, showing the following:

CLAIMANT'S NAME & ADDRESS: Angel Emergency Medical Services, LLC
P.O. Box 5495
Fort Oglethorpe, GA 30742-0695

Amount of 11 U.S.C. § 503 Administrative Expense: \$55,919.45

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 grounds for this liability owed by the Debtor is as follows:

Transportation services for patients.

3. The administrative expense is entitled to administrative priority under 11 U.S.C. § 503(b) and 11 U.S.C. § 503(a)(2) because:

4. 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. Records consist of in excess of 500 pages.
5. The amount of all payments on the administrative expense have been credited and deducted for the purpose of making this request.
6. 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 fund of up to Five Hundred Thousand Dollars and No/100 (\$500,000.00) or imprisonment for up to five (5) 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 this 4~~th~~ day of MARCH, 2016.

Name of Claimant: Angel Emergency Medical Services, LLC

Signed: Michael A. Anderson

By (if appropriate): Michael A. Anderson

As Its (if appropriate): Attorney and Authorized Agent

INSTRUCTIONS:

Mail the completed form by March 7, 2016, to the Clerk, United States Bankruptcy Court, Northern District of Georgia, Room 339, 600 East Frist 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, P.O. Box 90100, Los Angeles, CA 90009.

**Angel Emergency Medical Services
337 S. Cedar Lane
P.O. Box 5495
Ft. Oglethorpe, GA 30742
706-861-1234
706-861-2920 – Fax**

March 4, 2016

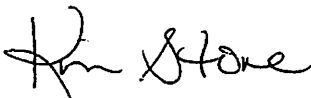
Mike Anderson
Patrick, Beard, Shulman & Jacoway, P.C.
Suite 202 Market Court
537 Market Street
Chattanooga, TN 37402

Re: Parkside Nursing Home

Listed below are the amounts that Parkside Nursing Home owes Angel EMS for services billed from November 30, 2014 through November 30, 2015:

	Billed Amt	Pd Amt	Amount Due:
November 2014	\$824.50	-0-	\$824.50
December 2014	- 0 -	-0-	-0-
January 2015	\$4,063.00	\$4,063.00	-0-
February 2015	\$3,585.80	-0-	\$3,585.80
March 2015	\$4,190.00	-0-	\$4,190.00
April 2015	\$3,892.00	-0-	\$3,892.00
May 2015	\$1,877.00	-0-	\$1,877.00
June 2015	\$1,659.00	-0-	\$1,659.00
July 2015	\$5,580.00	-0-	\$5,580.00
August 2015	\$3,812.00	-0-	\$3,812.00
September 2015	\$3,730.50	-0-	\$3,730.50
October 2015	\$3,468.00	-0-	\$3,468.00
November 2015	\$136.00	-0-	\$136.00
Totals.....	\$36,817.80	\$4,063.00	\$32,754.80

Sincerely,



Kim Stone
Angel Emergency Medical Services

Angel Emergency Medical Services
337 S. Cedar Lane
P.O. Box 5495
Ft. Oglethorpe, GA 30742
706-861-1234
706-861-2920 – Fax

March 4, 2016

Mike Anderson
Patrick, Beard, Shulman & Jacoway, P.C.
Suite 202 Market Court
537 Market Street
Chattanooga, TN 37402

Re: Hutcheson Medical Center

Listed below are the amounts that Hutcheson Medical Center owes Angel EMS for services billed from November 30, 2014 through November 30, 2015:

	Billed Amount	Pd Amt	Amount Due
November 2014	-0-	-0-	-0-
December 2014	\$138.50	-0-	\$138.50
January 2015	\$2,110.00	\$1,698.00	\$412.00
February 2015	\$1,416.00	\$1,416.00	-0-
March 2015	\$1,837.00	\$1,837.00	-0-
April 2015	\$4,476.50	-0-	\$4,476.50
May 2015	\$9,043.65	-0-	\$9,043.65
June 2015	\$2,129.00	-0-	\$2,129.00
July 2015	\$3,587.50	-0-	\$3,587.50
August 2015	\$1,429.00	-0-	\$1,429.00
September 2015	\$1,948.50	-0-	\$1,948.50
October 2015	-0-	-0-	-0-
November 2015	-0-	-0-	-0-
Totals	\$28,115.65	\$4,951.00	\$23,164.65

Sincerely,



Kim Stone
Angel Emergency Medical Services

PATRICK, BEARD, SCHULMAN & JACOWAY, P.C.

A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW

SUITE 202, MARKET COURT
537 MARKET STREET
CHATTANOOGA, TENNESSEE 37402-1240
www.pbsjlaw.com

TELEPHONE (423) 756-7117
FACSIMILE (423) 267-5032

MICHAEL A. ANDERSON
E-MAIL Address:
manderson@pbsjlaw.com

GARY R. PATRICK *
JOHN W. BEARD *
RICHARD A. SCHULMAN
STEVEN M. JACOWAY*
CARA J. ALDAY*
JERRE B. MOSLEY
R. JONATHAN GUTHRIE
CARTER J. LYNCH, III
MICHAEL A. ANDERSON*+
SUSIE LODICO
ELIZABETH M. HILL #
McKINLEY S. LUNDY, JR.
JOHN H. TEMPLETON *

* ALSO LICENSED IN GEORGIA
** ALSO LICENSED IN ALABAMA
ALSO LICENSED IN KENTUCKY

March 4, 2016

VIA FEDERAL EXPRESS-Priority Overnight

BMC Group

Attn: Hutcheson Medical Center, Inc.

Claims Processing
300 N. Continental Blvd., #570
El Segundo, CA 90245

**In re: OUR CLIENT: ANGEL EMERGENCY MEDICAL SERVICES, LLC
HUTCHESON MEDICAL CENTER, INC.
UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF
GEORGIA; CASE NO. 14-42863**

To Whom It May Concern:

We are enclosing a copy of the Request for Allowance and Payment of Administrative Expense Claim pursuant to 11 U.S.C. § 503 that has been filed with the clerk of the United States Bankruptcy Court for the Northern District of Georgia, Rome Division.

Sincerely,



Michael A. Anderson
For the Firm

MAA/te

Enclosure

cc: Mr. Dewayne Wilson (w/ enclosure)
Ms. Kim Stone (w/ enclosure)