

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

RECEIVED
MAR 08 2016
BMC GROUP

IN RE:) **CHAPTER 11**
)
HUTCHESON MEDICAL CENTER, INC.) **Jointly Administered Under**
and HUTCHESON MEDICAL DIVISION,) **CASE NO. 14-42863-pwb**
INC.,)
)
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: Pediatrix Medical Group of Tennessee, P.C.

1300 Sawgrass Corporate Parkway
Suite 200
Sunrise, Florida 33323

Amount of 11 U.S.C. § 503 Administrative Expense \$112,500.00

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:

Services provided by Pediatrix to the Debtor pursuant to a post-petition Neonatology Agreement.

[Redacted]

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:

The post-petition neonatology services provided by Pediatrix constitute actual and necessary costs that were essential in preserving the bankrupt estate.

[Redacted]



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.


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 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 7, 2016.

Name of Claimant: Dominic Andzeano

Signed: 

By (if appropriate): Pediatric Medical Group of Tennessee, P.C.

As Its (if appropriate): Secretary

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.

DISTRIBUTION LIST

**Martin P. Ochs
Office of the United States Trustee
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303**

**J. Robert Williamson
J. Hayden Kepner, Jr.
Scroggins & Williamson, P.C.
One Riverside
4401 Northside Parkway
Suite 450
Atlanta, GA 30327**

**David B. Kurzweil
Greenberg Traurig, LLP
3333 Piedmont Road, NE, Suite 2500
Atlanta, GA 30303**

**David E. Lemke
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, TN 37219**

IN RE:

HUTCHESON MEDICAL CENTER, INC.
and HUTCHESON MEDICAL DIVISION,
INC.

Chapter 11

Jointly Administered Under
Case No. 14-42863-pwb

Debtors.

CREDITOR: PEDIATRIX MEDICAL GROUP OF TENNESSEE, P. C.

SUMMARY

The post-petition Neonatology Agreement, dated December 12, 2014, contains a confidentiality provision. Thus, the agreement is not attached to this request. Pediatrix will, however, provide a copy to the Debtor or Trustee if they do not already have a copy.

STATEMENT

Pediatric Medical Group of TN, P.C.
 P. O. Box 281034
 Atlanta, GA 30384-1034

Statement Date:
 1/22/2016

Voice: 800-243-3839 ext. 5368
 Fax: 954-838-2584

Bill To: Hutchason Medical Center
 Attn: Farrell Hayes
 100 Gross Crescent Circle
 Ft Oglethorpe, GA 30742
 EML: Fhayes@hutchason.org

Customer PO		Payment Terms		Due Date	Customer Acct #	
					70000141 and 7-1808	
Account #	Units	Date of Service	Description	Unit Price	Extension	
700000141		Aug-12	Collection Guarantee	\$	\$	
		Sep-12	Collection Guarantee	\$	\$	
		Oct-12	Collection Guarantee	\$	\$	
		Nov-12	Collection Guarantee	\$	\$	
		Dec-12	Collection Guarantee	\$	\$	
		Jan-13	Collection Guarantee	\$	\$	
		Feb-13	Collection Guarantee	\$	\$	
		Mar-13	Collection Guarantee	\$	\$	
		Apr-13	Collection Guarantee	\$	\$	
		May-13	Collection Guarantee	\$	\$	
		Jun-13	Collection Guarantee	\$	\$	
		Jul-13	Collection Guarantee	\$	\$	
		Aug-13	Collection Guarantee	\$	\$	
700001808		Jun-15	Neonatology Services-On Call & In House	\$ 37,500.00	\$ 37,500.00	
		Jul-15	Neonatology Services-On Call & In House	\$ 37,500.00	\$ 37,500.00	
		Aug-15	Neonatology Services-On Call & In House	\$ 37,500.00	\$ 37,500.00	

Grand Total \$

PLEASE DETACH AND RETURN WITH PAYMENT

Customer ID#
 70000141 and 7-1808

ADDRESS Hutchason Medical Center
 Attn: Farrell Hayes
 100 Gross Crescent Circle
 Ft Oglethorpe, GA 30742

Amount Due: \$

REMIT TO: Attention: Michelo Salerno
 Pediatric Medical Group of TN, P.C.
 P. O. Box 281034
 Atlanta, GA 30384-1034

Please include Customer Account Number On Payment

CHAMBLISS

Liberty Tower
605 Chestnut Street, Suite 1700
Chattanooga, TN 37450
(423) 756-3000
chamblisslaw.com

CHAMBLISS, BAHNER & STOPHEL, P.C.

JEFFREY W. MADDUX
DIRECT DIAL (423) 757-0296
DIRECT FAX (423) 508-1296
jmaddux@chamblisslaw.com
ALSO LICENSED IN GEORGIA

March 7, 2016

VIA FEDERAL EXPRESS

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

Re: **Proofs of Claim for Filing in Hutcheson Medical Center, Inc., Case No. 14-42863** Pending
in the United States Bankruptcy Court, Northern District, Georgia

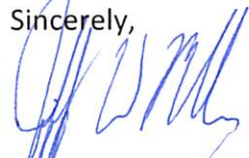
To Whom It May Concern:

Enclosed are three *Requests for Allowance and Payments of Administrative Expense Claim Pursuant to 11 U.S.C. §503* for the following entities:

<u>Entity Filing Claim</u>	<u>Amount of 11 U.S.C. §503 Administrative Expense</u>
1. Assist Healthcare Services, Inc.	\$62,577.50
2. Pediatrix Medical Group of TN, P.C.	\$112,500.00
3. Specialty Networks, LLC	\$51,781.22

These claims were filed with the U.S. Bankruptcy Court today in the above-referenced matter. If you have any questions please do not hesitate to contact me.

Sincerely,



Jeffrey W. Maddux
JWM/tlt
Enclosures

Court docketed claim follows this page.

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Dated: March 7, 2016.

Name of Claimant: Dominic Andreano

Signed: 

By (if appropriate): Pediatric Medical Group of Tennessee, P.C.

As its (if appropriate): Secretary

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4401 Northside Parkway
Suite 450
Atlanta, GA 30327**

**David B. Kurzweil
Greenberg Traurig, LLP
3333 Piedmont Road, NE, Suite 2500
Atlanta, GA 30303**

**David E. Lemke
Waller Lansden Dortch & Davis, LLP
511 Union Street, Suite 2700
Nashville, TN 37219**

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Amount Due: \$

REMIT TO: Attention: Michole Salerno
 Pediatric Medical Group of TN, P.C.
 P. O. Box 281034
 Atlanta, GA 30384-1034

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