

UNITED STATES BANKRUPTCY COURT
EASTER DISTRICT OF LOUISIANA

In re:

OCA, INC., et al;

Debtor(s).

Case No. 06-10179 (B)

Chapter 11

Jointly Administered with Case Numbers
06-10180 - 06-10223

**MOTION BY DRS. QUAS AND DR. DORNSIFE
TO JOIN IN STIPULATION**

MOTION

Vincent Quas, D.D.S., Juliana Panchura Quas, D.D.S., and their professional corporation Vincent Quas, D.D.S. and Juliana Panchura Quas, D.D.S., P.C.; and Roy F. Dornsife, and his professional corporation Roy F. Dornsife, DMD, PC; move for an order permitting them to join in the stipulation and order signed by the court on or about August 3, 2006 (Docket Nos. 1295 and 1316).

PROPOSED ORDER

The moving parties have submitted a proposed form of order with this motion.

ARGUMENT

The moving parties submit this motion to the court to be decided without oral argument.

POINTS AND AUTHORITIES

1. Drs. Quas and Dr. Dornsife, and their respective professional corporations, filed timely objections to the assumption of their Business Services Agreements in this proceeding. Drs. Quas also filed a motion for relief to continue litigation that has been pending for several years against two of the debtors in the United States District Court for the District of Oregon. That motion was recently denied.

2. On or about July 31, 2006, the Debtors and a number of doctors recently entered into a stipulation and proposed order regarding the trial of all issues relating to assumption of those doctors' Businesses Services Agreements. We were not informed about that stipulation and were not invited to participate in it. The court approved that stipulation, and made a portion of it effective as an order, on or about August 3, 2006. That stipulation and order required all doctors who wished to join the stipulation to do so before July 31, 2006 – four days before the order was entered. Otherwise, doctors wishing to join the stipulation must obtain the Debtors' permission to do so. Doctors who did not join in the stipulation face substantial limitations on their ability to litigate the assumption issues (their cases will be tried over two days without significant discovery, together with all confirmation issues).

3. Because the Debtors chose not to involve us in, or even notify us of, the discussions that led to some doctors entering into the stipulation, Drs. Quas and Dornsife were denied the opportunity to join in that stipulation. Because they deserve the same opportunities as

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the doctors with whom the Debtors chose to communicate, they should be allowed to join in that stipulation.

DATED: August 16, 2006.

HERSHNER HUNTER, LLP

By /s/ *Wm. Randolph Turnbow*
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Dornsife, and Roy F. Dornsife, DMD, PC

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**ORDER ON MOTION TO JOIN IN STIPULATION OF
DRS. QUAS AND DR. DORNSIFE**

This matter came before the court on the motion of Drs. Vincent Quas, Juliana Panchura Quas, and Roy F. Dornsife, and their respective professional corporations, seeking permission to join in the Stipulations and Order signed by this court on or about August 3, 2006 (Docket Nos. 1295 and 1316). Having considered the submissions of the parties, if any, the court hereby
ORDERS

That those parties' motion is granted and they shall be considered to have joined in the relevant stipulation.

DATED this ___ day of _____, 2006, at New Orleans, Louisiana.

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