

## Bankruptcy, Financial Reorganization and Creditors' Rights

The Creditors' Rights and Bankruptcy Reorganization Practice Group has broad experience in all aspects of bankruptcy, reorganization and creditors' rights matters, including complex litigation cases. This experience includes representing debtors, official and unofficial committees, secured and unsecured creditors, trustees and other parties in interest in out-of-court restructurings and in Chapter 11 reorganization cases. Our group has also structured "pre-negotiated" plans of reorganization to expedite the Chapter 11 process. We also have extensive experience in representing creditors in Uniform Commercial Code lien enforcement issues in state and federal courts. In addition, we provide advice and counsel to distressed public and private companies, their boards of directors, bank groups, receivers and other fiduciaries with regard to proposed financings, corporate transactions and real estate acquisitions.

While attempting to resolve matters through negotiation whenever possible, members of our Creditors' Rights and Bankruptcy Reorganization Team are routinely involved in litigating complex matters in bankruptcy courts, including valuation questions, fraudulent transfer and preference actions, DIP financing and use of cash collateral, adequate protection issues and contested confirmation hearings. The Team is also adept at state and federal court litigation involving the enforcement of creditors' rights under the Uniform Commercial Code, the Uniform Fraudulent Transfer Act and state receivership laws. Since restructuring issues are often inter-disciplinary, the Creditors' Rights and Bankruptcy Reorganization Practice Group often draws assistance from the Firm's other practice groups including, tax, banking, commercial litigation, real estate and corporate.

The members of our Team combine technical knowledge of the highly complex Bankruptcy Code, the Uniform Commercial Code, and other statutes dealing with creditors' rights, practical knowledge of the "real world" bankruptcy process and, as importantly, a sound understanding of the business issues confronting our clients.

### Representative Matters

---

- Representation of the unsecured creditors' committee in the Chapter 11 case of Watsonville Hospital Corporation, et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Mercy Hospital and Medical Center, et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of MTPC, LLC, et

# Sills Cummis & Gross P.C.

al.

- Representation of the unsecured creditors' committee in the Chapter 11 case of LRGHealthcare.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Randolph Health.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Thomas Health System, Inc.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Center City Healthcare, LLC d/b/a Hahnemann University Hospital, et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Astria Health, et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Promise Healthcare Group.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Curae Health, Inc., et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Morehead Memorial Hospital.
- Representation of the unsecured creditors' committee in the Chapter 9 case of Gainesville Hospital District d/b/a North Texas Medical Center.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Coshocton County Memorial Hospital Association.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Gardens Regional Hospital and Medical Center.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Progressive Acute Care LLC, et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Saint Michael's Medical Center.
- Representation of the unsecured creditors' committee in the Chapter 9 case of Union Hospital District.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Fairmont General Hospital.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Christ Hospital.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Hudson Healthcare, Inc.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Bayonne Medical Center.
- Representation of the unsecured creditors' committee in the Chapter 11 case of Novum Pharma.

# Sills Cummis & Gross P.C.

- Representation of Pascack Valley Hospital as a Chapter 11 debtor.
- Representation of Jersey City Medical Center as a Chapter 9 debtor.
- Representation of the unsecured creditors' committee in the Chapter 11 cases of 710 Long Ridge Road Operating Company II, LLC, et al., operator of five sub-acute and long-term nursing care facilities.
- Special counsel to the unsecured creditors' committee in the Chapter 11 cases of Specialty Hospital of America, LLC, et al.
- Representation of a major debt holder in the Chapter 11 reorganization of Erickson Retirement Communities - one of the largest developers and operators of Continuing Care Retirement Communities in the U.S.
- Representation of the unsecured creditors' committee in the Chapter 11 cases of In re Ultura (LA) Inc., et al.
- Representation of the unsecured creditors' committee in the Chapter 11 case of the College of New Rochelle.
- Representation of clients in a *In re Bernard L. Madoff Investment Securities LLC* adversary proceeding with claims exceeding \$1 billion.
- Representation of various investment funds in connection with the conversion of approximately \$200 million of debt to equity to facilitate the acquisition of Motor Coach Industries International, Inc. through a pre-negotiated Chapter 11 process.
- Representation of two national telecommunications companies as creditors in major Chapter 11 cases including Winstar, Enron, Teleglobe and WorldCom.
- Representation of one of the largest unsecured creditors in the Chapter 11 case of Washington Group International, a construction company which had debts in excess of \$5 billion.
- Representation of a nationally-known engineering and design company in a Chapter 11 case filed to address the company's asbestos-based personal injury liabilities.
- Representation of one of the largest owner/managers of commercial real estate in the United States in bankruptcy cases nationwide, including Linens 'n Things, Blockbuster, Urban Brands (Ashley Stewart), Sbarro and Chevy's Restaurants.
- Representation of a pre-petition and DIP lender owed in excess of \$100 million in a large paper product manufacturing Chapter 11 case.