

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

In re)
) Chapter 11, No. 14-
)
HAMPDEN COUNTY PHYSICIAN)
ASSOCIATES, LLC)
)
Debtor)
)

**MOTION TO EXTEND TIME TO FILE SCHEDULES AND
STATEMENT OF FINANCIAL AFFAIRS**

To the HONORABLE HENRY J. BOROFF, Bankruptcy Judge:

Now comes HAMPDEN COUNTY PHYSICIAN ASSOCIATES, LLC ("Debtor"), the Debtor in the above-captioned matter, and it does hereby move this Court for the entry of an Order, pursuant to Rule 1007(c) of the Federal Rules of Bankruptcy Procedure, extending time to file Schedules and a Statement of Financial Affairs. In support of this Motion, the Debtor represents as follows:

1. On October 2, 2014 ("Petition Date"), the Debtor filed a Voluntary Petition under the provisions of Chapter 11 of the United States Bankruptcy Code ("Bankruptcy Code") with the United States Bankruptcy Court for the District of Massachusetts ("Bankruptcy Court").

2. Pursuant to the provisions of §§ 1107 and 1108 of the Bankruptcy Code, the Debtor has continued to operate its business and manage its business affairs as a Debtor-in-Possession. No Trustee or examiner has been requested or appointed.

3. The Debtor is a multi-specialist physician group engaged in the practice of medicine in Western Massachusetts. Its approximately sixty-eight (68) healthcare providers serve about 55,000 patients. The business enterprise employs a total of approximately 300 individuals and operates fourteen (14) offices primarily located throughout Hampden County, Massachusetts. In addition, the Debtor and its staff serve patients at local hospitals, skilled-nursing facilities, and long-term care facilities. The Debtor operates its own laboratory, sleep disorder center, and urgent care center.

4. Pursuant to § 521 of the Bankruptcy Code and Rule 1007 of the Federal Rules of Bankruptcy Procedure ("Federal Bankruptcy Rules"), the Debtor is required to file Schedules of assets and liabilities ("Schedules") and a Statement of Financial Affairs ("Statements") within fourteen (14) days of the Petition Date.

5. The Federal Bankruptcy Rules further provide that, upon motion, the Court may order an extension of time within which the Schedules and Statements may be filed "for cause".

6. In order to prepare complete and accurate Schedules and Statements, the Debtor must gather and review a substantial amount of information and documentation related to its complex financial affairs. Although efforts have been made to complete the required pleadings within the period of time provided by the Federal Bankruptcy Rules, the Debtor anticipates that it may not be able to complete its Schedules and Statements within the time specified because of the pressing administrative and procedural issues inherent in the commencement of this large Chapter 11 bankruptcy case.

7. The Debtor and its professionals require the requested extension to ensure the accuracy and completeness of its Schedules and Statements.

8. Through this Motion, the Debtor requests an extension of fourteen (14) days of the deadline to file Schedules and Statements to October 30, 2014.

9. The Debtor says that it has informed the Office of the United States Trustee that it intends to extend the time to file Schedules and Statements.

WHEREFORE, the Debtor respectfully requests the entry of an Order extending the deadline to file its Schedules and Statement of Financial Affairs to October 30, 2014 and providing such other and further relief as the Court may deem just and proper.

HAMPDEN COUNTY PHYSICIAN
ASSOCIATES, LLC

Dated: October 2, 2014

By: /s/ Andrea M. O'Connor
JOSEPH B. COLLINS, ESQ.
(BBO No. 092660)
HENRY E. GEBERTH, JR., ESQ.
(BBO No. 187940)
ANDREA M. O'CONNOR, ESQ.
(BBO No. 679540)
For HENDEL & COLLINS, P.C.
101 State Street
Springfield, MA 01103
Tel. (413) 734-6411
jcollins@hendelcollins.com
hgeberth@hendelcollins.com
aconnor@hendelcollins.com

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____))
In re) Chapter 11, No. 14-
))
HAMPDEN COUNTY PHYSICIAN)
ASSOCIATES, LLC)
))
Debtor)
_____)

**ORDER ON MOTION TO EXTEND TIME TO FILE SCHEDULES AND STATEMENT OF
FINANCIAL AFFAIRS**

Upon the Motion to Extend Time to File Schedules and Statement of Financial Affairs ("Motion") filed by HAMPDEN COUNTY PHYSICIAN ASSOCIATES, LLC ("Debtor"), the Debtor in the above-captioned matter, seeking the entry of an Order extending the time to file Schedules of assets and liabilities and a Statement of Financial Affairs, after notice and hearing, and for cause shown, it is hereby

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the time for the Debtor to file Schedules and a Statement of Financial Affairs is extended by fourteen (14) days to October 30, 2014.

Dated:

HONORABLE HENRY J. BOROFF
U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____))
In re) Chapter 11, No. 14-)
))
HAMPDEN COUNTY PHYSICIAN))
ASSOCIATES, LLC))
))
Debtor))
_____)

CERTIFICATE OF SERVICE

I, ANDREA M. O'CONNOR, of the law firm of HENDEL & COLLINS, P.C., 101 State Street, Springfield, Massachusetts do hereby certify that I caused a copy of the attached Motion to be served by first class mail, postage prepaid, to any of the parties listed on the attached Exhibit "A" not noted as having received service through the Court's CM/ECF system on the 2nd day of October, 2014.

Dated: October 2, 2014

/s/ Andrea M. O'Connor
ANDREA M. O'CONNOR, ESQ.
(BBO No. 679540)
For HENDEL & COLLINS, P.C.
101 State Street
Springfield, MA 01103
Tel. (413) 734-6411
aconnor@hendelcollins.com

Exhibit "A"

Lisa A. Patenaude, CPA
HAMPDEN COUNTY PHYSICIAN ASSOCIATES, LLC
354 Birnie Avenue
Springfield, MA 01103

Richard T. King, Esq.
OFFICE OF THE U.S. TRUSTEE
446 Main Street, 14th Floor
Worcester, MA 01608

Edward J. Green, Esq.
FOLEY & LARDER, LLP
99 High Street, 20th Floor
Boston, MA 02110

Peter W. Shrair, Esq.
COOLEY SHRAIR, P.C.
1380 Main Street, Suite 500
Springfield, MA 01103

INTERNAL REVENUE SERVICE
Attn: Bankruptcy Unit
P.O. Box 7346
Philadelphia, PA 19101

INTERNAL REVENUE SERVICE
Attn: Bankruptcy Unit
P.O. Box 9112
Boston, MA 02203-9112

MASSACHUSETTS DEPARTMENT OF REVENUE
Attn: Bankruptcy Unit
P.O. Box 9564
Boston, MA 02114-9564

Alan H. Einhorn, Esq.
FOLEY & LARDER, LLP
111 Huntington Avenue, Suite 2600
Boston, MA 02199-7610

Mr. Daniel P. Moen
SISTERS OF PROVIDENCE HEALTH SYSTEM, INC.
271 Carew Street
Springfield, MA 01104

Exhibit "A"

Mr. Thomas Robert
SISTERS OF PROVIDENCE HEALTH SYSTEM, INC.
271 Carew Street
Springfield, MA 01104

Bradford R. Martin, Jr., Esq.
MORRISON MAHONEY, LLP
1500 Main Street, Suite 2400
Springfield, MA 01115

TD BANK, NATIONAL ASSOCIATION
2035 Limestone Road
Wilmington, DE 19808

CONNECTICUT PHYSICIANS SERVICES
207 Main Street
Hartford, CT 06106

CAREW CHESTNUT PARTNERS, LLC
P.O. Box 180
West Springfield, MA 01090

ALLSCRIPTS HEALTHCARE, LLC
24630 Network Place
Chicago, IL 60673-1246

MERCY INTERNAL MEDICINE SERVICES
Attn: Susan Higgins
1221 Main Street, #108
Holyoke, MA 01040

CONVERGENT
9501 Post Office Park
Wilbraham, MA 01095

SPYGLASS
2001 Crocker Road, Suite 200
Westlake, OH 44145

PSS WORLD MEDICAL, INC.
3 Walpole Park South Drive, Unit 11
Walpole, MA 02081

BCHP PARTNERS, LLC
P.O. Box 180
West Springfield, MA 01089

Exhibit "A"

ALK-ABELLO PHARMACEUTICALS, INC.
7806 Solutions Center
Chicago, IL 60677-7806

KLONDIKE INVESTMENT GROUP, LLC
c/o Colebrook Management
1441 Main Street
Springfield, MA 01103

SYSTEM COORDINATED SERVICES, INC.
c/o Sisters of Providence
1233 Main Street
Holyoke, MA 01040

LYON OFFICES, LLC
P.O. Box 180
West Springfield, MA 01090

PRIORITY HEALTHCARE DISTRIBUTION, INC.
d/b/a CuraScript Specialty
P.O. Box 533307
Charlotte, NC 28290-3307

HILLSIDE DEVELOPMENT CORP.
267 Hillside Road
Southwick, MA 01077-9685

80 CONGRESS STREET, LLC
P.O. Box 2342
South Burlington, VT 05407

VERIZON BUSINESS
P.O. Box 660794
Dallas, TX 75266-0794

BECKMAN COULTER, INC.
Dept. CH 10164
Palatine, IL 60055-0164

SAREMI, LLP
2073 Roosevelt Avenue
Springfield, MA 01104

MICHAEL B. GUARCO, SR.
7 Bayberry Drive
East Granby, CT 06026

Exhibit "A"

WB MASON
P.O. Box 981101
Boston, MA 02298-1101