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6 Attorneys for LRS Healthcare, Inc.

The Honorable Frank L. Kurtz  
 Chapter: 11  
**Objection Deadline: October 11, 2019**  
**Hearing Date and Time: TBD,**  
**if objection is filed**

10 UNITED STATES BANKRUPTCY COURT  
 11 EASTERN DISTRICT OF WASHINGTON

12 In re  
 13 ASTRIA HEALTH, et al,  
 14 Debtor.<sup>1</sup>

Case No. 19-01189-11 (Administratively  
 Consolidated)

**MOTION TO WITHDRAW AS  
 COUNSEL FOR LRS HEALTHCARE,  
 INC.**

17  
 18 Russell D. Garrett of Jordan Ramis PC moves the Court for an Order Granting Leave to  
 19 Withdraw as Counsel for creditor LRS Healthcare, Inc. ("LRS") pursuant to Local Rule 9010-  
 20 1(b)(5)(A). Good cause exists because on September 27, 2019, LRS notified Jordan Ramis PC  
 21 through its *Pro Hac Vice* counsel, Patrick Patino, that Jordan Ramis PC's services were

22  
 23 <sup>1</sup> The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11),  
 24 Glacier Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11),  
 25 Oxbow Summit, LLC (19-01195-11), SHS Holdco, LLC (19-01196-11), SHC Medical Center –  
 26 Toppenish (19-01190-11), SHC Medical Center – Yakima (19-01192-11), Sunnyside  
 Community Hospital Association (19-01191-11), Sunnyside Home Health (19-01198-11),  
 Sunnyside Professional Services, LLC (19-01199-11), Yakima Home Care Holdings, LLC (19-  
 01201-11), and Yakima HMA Home Health, LLC (19-01200-11).



1 terminated immediately. Withdrawal is requested as counsel for LRS and also as associated  
2 local counsel for Mr. Patino (Pro Hac Vice). Jordan Ramis PC cannot serve as associated  
3 counsel for Mr. Patino without also serving as counsel for LRS. Jordan Ramis PC has no further  
4 authority to act on behalf of LRS directly or indirectly by assisting as local *Pro Hac Vice* counsel  
5 for Mr. Patino. Although there are other factors that justify or require withdrawal, LRS  
6 termination of Jordan Ramis PC is the most significant so the rest will not be outlined here. Mr.  
7 Patino has not informed Russell D. Garrett whether he has retained new local counsel but has  
8 informed Mr. Garrett that the new contact information for LRS is:

9 LRS Healthcare, Inc.  
10 c/o Patrick Patino  
11 Koenig Dunne  
12 1266 S 13<sup>th</sup> Street  
13 Omaha, NE 68108  
14 Telephone: (402) 346-1132  
15 Email: [patrickp@koenigdunne.com](mailto:patrickp@koenigdunne.com)

16 Jordan Ramis PC holds no funds of LRS and has no file materials that Mr. Patino's firm  
17 does not have. Jordan Ramis PC will provide whatever file materials are requested. LRS and  
18 Mr. Patino are not prejudiced because there are no pending court deadlines for any contested  
19 matter or adversary proceeding involving LRS.

20 For these reasons, counsel respectfully requests that the Court enter an order granting  
21 leave to withdraw as counsel for LRS. A proposed order is submitted herewith.

22 DATED this 27<sup>th</sup> day of September, 2019.

23 JORDAN RAMIS PC

24 By: /s/ Russell D. Garrett  
25 Russell D. Garrett, WSBA #18657  
26 Daniel L. Steinberg, WSBA #30080  
*Attorneys for LRS Healthcare, Inc.*

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10 UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

11 In re  
12 ASTRIA HEALTH, et al,  
13 Debtor.<sup>1</sup>  
14  
15  
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Case No. 19-01189-11 (Administratively  
Consolidated)

**[PROPOSED] ORDER GRANTING  
MOTION TO WITHDRAW AS  
COUNSEL FOR LRS HEALTHCARE,  
INC.**

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18 This matter came before the Court on the motion of Russell D. Garrett of Jordan Ramis  
19 PC, for an order allowing him and Jordan Ramis to withdraw as counsel for creditor LRS  
20 Healthcare, Inc. (“LRS”) pursuant to Local Rule 9010-1(b)(5)(A) (the “Motion”). The Court  
21 considered the Motion, the pleadings and filings herein. The Court finds that the Notice  
22

23 <sup>1</sup> The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11),  
24 Glacier Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11),  
25 Oxbow Summit, LLC (19-01195-11), SHS Holdco, LLC (19-01196-11), SHC Medical Center –  
26 Toppenish (19-01190-11), SHC Medical Center – Yakima (19-01192-11), Sunnyside  
Community Hospital Association (19-01191-11), Sunnyside Home Health (19-01198-11),  
Sunnyside Professional Services, LLC (19-01199-11), Yakima Home Care Holdings, LLC (19-  
01201-11), and Yakima HMA Home Health, LLC (19-01200-11).

**[PROPOSED] ORDER GRANTING MOTION TO  
WITHDRAW AS COUNSEL FOR LRS HEALTHCARE,  
INC. - Page 1**

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1 complied with Local Rule 9010-1(b)(5)(B) and good cause exists to allow Russell D. Garrett and  
2 Jordan Ramis PC to withdraw as counsel for creditor LRS Healthcare, Inc. Accordingly, it is  
3 hereby

4 ORDERED that the Motion to Withdraw as Counsel for LRS Healthcare, Inc. is granted.

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6 **/// END OF ORDER ///**

7 Presented by:

8 JORDAN RAMIS PC

9  
10 /s/ Russell D. Garrett

11 Russell D. Garrett, WSBA #18657  
12 Daniel L. Steinberg, WSBA #30080  
Attorneys for LRS Healthcare, Inc.