

1 Toni Meacham, #35068

2 Attorney at Law

3 1420 Scooteney Rd

4 Connell, WA 99326

5 (509) 488-3289

7 Austin McMullen (admitted *pro hac vice*)

8 Bradley Arant Boult Cummings LLP

9 1600 Division Street, Suite 700

10 Nashville TN 37203

11 (615) 252-2307

12 AMcMullen@Bradley.com

14 Counsel for Plaintiffs

16 UNITED STATES BANKRUPTCY COURT

17 IN AND FOR THE EASTERN DISTRICT OF WASHINGTON

<p>In re: ASTRIA HEALTH, <i>et al.</i>, Debtors.</p>	<p>Chapter 11 Case No. 19-01189-11 (Jointly Administered)</p>
<p>YAKIMA HMA, LLC, and YAKIMA HMA PHYSICIAN MANAGEMENT, LLC, Plaintiffs, v. SHC MEDICAL CENTER – YAKIMA and SHC MEDICAL CENTER – TOPPENISH, Defendants.</p>	<p>Adv. Proc. No. 20-80018-WLH JOINT FRCP 26(f) DISCOVERY PLAN</p>

18 4829-0263-5707.1



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2 TO: The Honorable Whitman L. Holt

3 AND TO: U.S. Bankruptcy Court Clerk

4 COME NOW Plaintiffs Yakima HMA, LLC, and Yakima Physician Management, LLC,
5 by and through counsel of record and in accordance with the Notice of Scheduling Conference
6 (Docket No. 2) entered by the Court on May 20, 2020, hereby report as follows:

7 Plaintiffs' counsel received a letter from Defendants' counsel on June 25, 2020 alleging
8 that service of process in this adversary proceeding was improper. Plaintiffs disagree with
9 Defendants' allegations.

10 On June 30, 2020, counsel for the Plaintiffs and counsel for the Defendants conferred.
11 Counsel discussed the status of service of process, the nature and basis of the claims and
12 defenses, what discovery would be needed and the possibility for promptly settling or resolving
13 the adversary proceeding. Counsel agreed to exchange certain information in an effort to reach
14 a prompt settlement.

15 Afterwards, Plaintiffs, in a good faith effort to efficiently move this matter forward and
16 not waste resources arguing over service of process, have requested the reissuance of
17 summonses in this adversary proceeding to allow for additional service of process.

18 Plaintiffs request that the scheduling conference currently set for July 8, 2020, be
19 continued for approximately one month to allow for additional service of process upon
20 Defendants, for the parties to have a more complete discussion of the needs of the case and for
21 the parties to prepare and submit a proposed discovery plan as contemplated by Rule 26(f).

4829-0263-5707.1

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2 DATED this ____ day of _____, 2020.
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4 ATTORNEYS FOR PLAINTIFFS:
5

6 /s/ Toni Meacham

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13 /s/ Austin McMullen

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