

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

IN RE:)	CHAPTER 11
)	
REGIONAL HOUSING & COMMUNITY SERVICES CORP., et al.,)	Jointly Administered Under
)	CASE NO. 21-41034-pwb
)	
Debtors.)	

**THIRD MOTION FOR EXTENSION OF TIME TO
ASSUME OR REJECT NONRESIDENTIAL REAL PROPERTY LEASES**

COME NOW the above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”),¹ in the above-styled jointly administered case (the “**Case**”), by and through the undersigned counsel, and pursuant to 11 U.S.C. §365(d)(4) and Bankruptcy Rule 9006(b)(1), and make and file this their Third Motion for Extension of Time to Assume or Reject Nonresidential Real Property Leases (the “**Motion**”). In support of the Motion, the Debtors show the Court as follows:

1.

On August 26, 2021 (the “**Petition Date**”), the Debtors each filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the Northern District of Georgia, Rome Division (the

¹ The Debtors in these chapter 11 cases include: Regional Housing & Community Services Corporation, RHCSC Columbus AL Holdings LLC, RHCSC Columbus Health Holdings LLC, RHCSC Douglas AL Holdings LLC, RHCSC Douglas Health Holdings LLC, RHCSC Gainesville AL Holdings LLC, RHCSC Gainesville Health Holdings LLC, RHCSC Montgomery I AL Holdings LLC, RHCSC Montgomery I Health Holdings LLC, RHCSC Montgomery II AL Holdings LLC, RHCSC Montgomery II Health Holdings LLC, RHCSC Rome AL Holdings LLC, RHCSC Rome Health Holdings LLC, RHCSC Savannah AL Holdings LLC, RHCSC Savannah Health Holdings LLC, RHCSC Social Circle AL Holdings LLC, and RHCSC Social Circle Health Holdings LLC.



“**Court**”). The Debtors are authorized to operate their businesses as debtors-in-possession pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code.

2.

No committee, trustee or examiner has been requested or appointed in this Case.

3.

The Debtors own eight senior living facilities located in rural cities or towns in Georgia or Alabama (the “**Facilities**”). For each Facility, one Debtor owns the real property and leases the real property to an affiliated Debtor that operates the Facility.

4.

The Debtors are parties to several real property leases, including but not limited to those identified on Exhibit A attached hereto (the “**Leases**”). While the Leases may constitute residential real property leases due to the fact that the Facilities house numerous senior residents, out of an abundance of caution, the Debtors nonetheless seek the treatment requested herein as if the Leases were determined to be nonresidential real property leases.

5.

On December 16, 2021, this Court entered an Order Granting Debtors’ Motion for Extension of Time to Assume or Reject Nonresidential Real Property Leases [Dkt. No. 102] extending the initial deadline for the Debtors to assume or reject nonresidential real property leases through and including March 24, 2022.

6.

On April 20, 2022, this Court entered an Order Granting Debtors’ Second Motion for Extension of Time to Assume or Reject Nonresidential Real Property Leases [Dkt. No. 133] extending the initial deadline for the Debtors to assume or reject nonresidential real property leases

through and including June 30, 2022.

7.

The Debtors are in the process of marketing their assets for sale to one or more buyers. As a result, the Debtors need more time to evaluate all potential exit strategies and determine the best course of action to propose in any Chapter 11 plan(s). The Debtors' decision regarding assumption or rejection of the Leases will be dependent upon the proposed exit from Chapter 11. Thus, cause exists to further extend the deadline to assume or reject nonresidential real property Leases.

8.

Debtors request an extension through and including September 30, 2022, to assume or reject non-residential real property Leases, and the applicable lessors shown on Exhibit A have consented to such extension.

WHEREFORE, Debtors pray that the Court grant this Motion and enter an Order extending the time within which to assume or reject nonresidential real property Leases through and including September 30, 2022, or such longer period as may be agreed upon by the Debtors and the applicable lessor, and grant such other and further relief as the Court deems just and proper.

This 29th day of June, 2022.

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EXHIBIT A

LESSOR	LESSEE	LEASE DESCRIPTION
RHCSC Rome Health Holdings LLC	RHCSC Rome AL Holdings LLC	Real property lease for facility located at The Gardens of Rome
RHCSC Columbus Health Holdings LLC	RHCSC Columbus AL Holdings LLC	Real property lease for facility located at The Landings at Columbus
RHSCS Douglas Health Holdings LLC	RHCSC Douglas AL Holdings LLC	Real property lease for facility located at The Landings at Douglas
RHSCS Montgomery I Health Holdings LLC	RHSCS Montgomery I AL Holdings LLC	Real property lease for facility located at The Gardens of Waterford
RHSCS Montgomery II Health Holdings LLC	RHSCS Montgomery II AL Holdings LLC	Real property lease for facility located at The Landings at Montgomery
RHSCS Savannah Health Holdings LLC	RHSCS Savannah AL Holdings, LLC	Real property lease for facility located at The Gardens of Savannah
RHSCS Social Circle Health Holdings LLC	RHSCS Social Circle AL Holdings LLC	Real property lease for facility located at The Gardens of Social Circle
RHCSC Gainesville Health Holdings LLC	RHSCS Gainesville AL Holdings LLC	Real property lease for facility located at The Landings at Gainesville

CERTIFICATE OF SERVICE

This is to certify that on this date a true and correct copy of the within and foregoing **Third Motion for Extension of Time to Assume or Reject Nonresidential Real Property Leases** was served by the Court's CM/ECF system on all counsel of record registered in this case through CM/ECF.

This 29th day of June, 2022.

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