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Chapter 11 Debtors and Debtors In Possession*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON**

In re:

ASTRIA HEALTH, *et al.*,

Debtors and Debtors in
Possession.¹

UNITED STATES SMALL
BUSINESS ADMINISTRATION and
JOVITA CARRANZA, in her capacity

District Court Case No. 2:20-cv-3098-RMP,
Consolidated with District Court Case No. 1:20-cv-
3089-RMP

On Appeal from United States Bankruptcy Court for
the Eastern District of Washington

Bankruptcy Court Lead Case No. 19-01189-11
Chapter 11, Jointly Administered

Adversary Proceeding No. 20-80016-WLH

**UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE APPELLEES / CROSS-
APPELLANTS' REPLY BRIEF**

¹ The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11), Glacier Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11), Oxbow Summit, LLC (19-01195-11), SHC Holdco, LLC (19-01196-11), SHC Medical Center - Toppenish (19-01190-11), SHC Medical Center - Yakima (19-01192-11), Sunnyside Community Hospital Association (19-01191-11), Sunnyside Community Hospital Home Medical Supply, LLC (19-01197-11), 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).



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1 as Administrator for the United States
2 Small Business Administration,

3 Appellants /
4 Cross-Appellees,

5 v.

6 ASTRIA HEALTH, *et al.*,

7 Appellees /
8 Cross-Appellants.

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Debtor Astria Health, Debtor SHC Medical Center - Toppenish, doing business as Astria Toppenish Hospital, both Washington nonprofit corporations under § 501(c)(3) of title 26 of the United States Code, and Debtor Yakima HMA Home Health LLC, doing business as Astria Home Health & Hospice-Yakima, also a Washington corporation, along with the above-referenced affiliated debtors (collectively, the “Debtors”), the debtors and debtors in possession in the chapter 11 bankruptcy cases (collectively, the “Chapter 11 Cases”), pending in the United States Bankruptcy Court for the Eastern District of Washington (the “Bankruptcy Court”) and the appellees / cross-appellants herein, hereby submit this motion (“Motion”) for a brief extension of the deadline to file their brief in reply to the Debtors’ cross-appeal (the “Reply”). The Reply would otherwise be due on December 18, 2020 under Rule 8016 of the Federal Rules of Bankruptcy Procedure.

This is the Debtors’ first request for an extension, the United States, on behalf of the Small Business Administration and Jovita Carranza in her capacity as Administrator for the SBA (the “SBA”), consents to the extension, and the short extension is supported by good cause. The Debtors did not oppose the SBA’s motion [Docket No. 16] to extend the SBA’s deadline to file its Reply and Response until December 4, 2020; however, extending such deadline for the SBA caused the Debtors’ deadline to file the Reply to fall on the same day that the Debtors have scheduled a hearing before the Bankruptcy Court on confirmation of the Debtors’ plan of reorganization, which is a contested hearing and is arguably the most important, complex hearing of their entire Chapter 11 Cases. Furthermore, the length of the requested extension to file their Reply takes into consideration two significant upcoming federal holidays, Christmas and New Year’s Day, and related vacation plans. These holidays and various vacation plans would make it difficult to coordinate the Debtors’ Reply absent a slightly longer extension than what this Court recently afforded to the SBA.

1 WHEREFORE, the Debtors respectfully request that the Court extend the
2 deadline to file the Debtors' Reply by nine (9) business days, so that the Reply is
3 due on January 4, 2020.

4 Dated: December 18, 2020

/s/ Samuel R. Maizel

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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2020, I electronically filed the *Unopposed Motion For Extension Of Time To File Appellees / Cross-Appellants' Reply Brief* with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

Dated: December 18, 2020

/s/ Samuel R. Maizel

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