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UNITED STATES BANKRUPTCY COURT
 DISTRICT OF NEW JERSEY

In re:	:	Chapter 11
	:	Case No. 07-
NATHAN AND MIRIAM BARNERT	:	
MEMORIAL HOSPITAL ASSOCIATION	:	
d/b/a BARNERT HOSPITAL,	:	Hearing Date: August __, 2007,
	:	__ : __ .m.
Debtor.	:	

**APPLICATION IN SUPPORT OF THE DEBTOR'S MOTION FOR AN
 ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENT OF
FINANCIAL AFFAIRS PURSUANT TO FED. R. BANKR. P. 1007(c)**

TO: HONORABLE JUDGE OF THE
 UNITED STATES BANKRUPTCY COURT

The Application of Nathan and Miriam Barnert Memorial Hospital Association d/b/a Barnert Hospital, the within debtor and debtor-in-possession (the "Debtor"), by and through its proposed counsel, McCarter & English, LLP, respectfully represents:

I. INTRODUCTION AND JURISDICTION

1. This Application is submitted in support of the Debtor's motion for entry of an Order extending for thirty-two (32) days the time within which it must file its schedules of assets and liabilities ("Schedules") and statement of financial affairs ("SOFA") pursuant to Fed. R. Bankr.

P. 1007(c) (the "Motion").

2. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 1334 and 157(b). This is a "core" proceeding pursuant to 28 U.S.C. § 157(b)(A) and (O).

3. Venue is proper in this Court pursuant to 28 U.S.C. §1409(a).

II. BACKGROUND

4. On August 15, 2007 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 11, Title 11 of the United States Code (the "Bankruptcy Code"). Since the Petition Date, the Debtor has remained in possession of its assets and management of its business as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

5. A detailed description of the Debtor's business and the facts precipitating the filing of the Debtor's Chapter 11 proceeding is set forth in the Affidavit of Peter J. Betts submitted in support of the Debtor's various First Day Motions. Those facts are incorporated herein by reference.

III. RELIEF REQUESTED AND BASIS THEREFOR

6. On the Petition Date, the Debtor filed with this Court a list of creditors holding the forty largest unsecured claims against the Debtor's estate, as well as its secured lenders, and its creditor matrix. Pursuant to Fed. R. Bankr. P. 1007(c), the Debtor's Schedules and SOFA must be filed no later than fifteen (15) days after the Petition Date, which date is August 30, 2007.

7. In the period immediately preceding the Petition Date, the Debtor and its professionals were required to focus on numerous tasks necessary to ensure the Debtor's continued operations of providing quality healthcare while also attending to the filing of its Chapter 11 case, including: (a) evaluating various financing options to allow the hospital to continue to operate; (b) reviewing voluminous financing and other documents in preparation of the Chapter 11 filing; (c) responding to inquiries of the Debtor's Board of Trustees, executives

and key employees; and (d) addressing issues relating to the Debtor's cash needs and proposed use of cash collateral.

8. As a result of those and other factors, the Debtor and its professionals have yet to fully complete the Schedules and SOFA and anticipate that such documents may not be completed by the deadline established by Fed. R. Bankr. P. 1007(c). Rather than filing incomplete schedules that would have to be amended at a later date, the Debtor seeks a limited extension of time to complete that task.

9. Due to the complexity of its operations, and the speed with which the Debtor sought bankruptcy protection, the Debtor anticipates that it will be unable to complete its Schedules prior to the expiration of the time allotted by Bankruptcy Rule 1007.

10. To prepare the required Schedules, the Debtor must gather information from books, records and documents relating to a multitude of transactions and operations. Consequently, collection of the necessary information requires an expenditure of substantial time and effort. Given the significant burdens already imposed upon the Debtor's management by the commencement of this chapter 11 case, together with related operational obstacles, and personnel limitations, the Debtor will require additional time to accurately and comprehensively complete and file the Schedules.

11. Pursuant to Bankruptcy Rule 1007(b) and (c), a chapter 11 debtor must file with the petition, or if the petition is accompanied by a list of all of the debtor's creditors and their addresses, within fifteen (15) days thereafter, schedules of assets and liabilities, a schedule of current income and expenditure, a schedule of executory contracts and unexpired leases, and a statement of financial affairs, unless that time period is extended by the court on motion and for cause shown. *See Fed.R.Bankr.P. 1007(b) & (c).*

12. Accordingly, consistent with Bankruptcy Rules 1007(c) and 9006(b), the Debtor respectfully requests that this Court extend by thirty-two (32) days the date by which the

Schedules must be filed under Bankruptcy Rules 1007(b) and (c), through and including October 1, 2007. The Debtor submits that the sheer volume of material that must be compiled and reviewed in order to complete the Schedules in this case amply justifies, if not compels, the requested extension.

WHEREFORE, the Debtor respectfully requests entry of the accompanying Order: (a) extending to October 1, 2007 the time within which the Debtor must file its Schedules and SOFA, and (b) granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Dated: Newark, New Jersey
August 15, 2007

McCARTER & ENGLISH, LLP,
Proposed Attorneys to Nathan and
Miriam Barnert Memorial Hospital
Association d/b/a Barnert Hospital

By: /s/ David J. Adler
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In the Matter of:

NATHAN AND MIRIAM BARNERT

MEMORIAL HOSPITAL ASSOCIATION d/b/a

BARNERT HOSPITAL

Debtor-in-Possession.

Case No.: 07-

Judge:

Hearing Date

**ORDER APPROVING DEBTOR'S MOTION FOR AN ORDER EXTENDING
TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL
AFFAIRS PURSUANT TO FED. R. BANKR. P. 1007(c)**

The relief set forth on the following pages, numbered two (2) is hereby ORDERED.

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Debtor:	NATHAN AND MIRIAM BARNERT MEMORIAL HOSPITAL ASSOCIATION d/b/a BARNERT HOSPITAL
Case Nos.	07-
Caption of Order:	ORDER APPROVING DEBTOR'S MOTION FOR AN ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO FED. R. BANKR. P. 1007(c)

THIS MATTER having been opened to the Court by Nathan and Miriam Barnert Memorial Hospital Association d/b/a Barnert Hospital, the within debtor and debtor-in-possession herein (the "Debtor"), by and through its proposed counsel, McCarter & English LLP, upon a motion for an Order extending for sixty (60) days the Debtor's time to file its schedules of assets and liabilities ("Schedules") and statement of financial affairs ("SOFA") pursuant to Fed. R. Bankr. P. 1007(c) (the "Motion"); and notice of the hearing on the Motion having been provided to all parties in interest in accordance with the Order Regarding Application for Expedited Consideration of First Day Matters previously entered by the Court, as evidenced by the Affidavit of Service filed with the Court; and the Court having considered the Motion, the opposition thereto, if any, and the arguments of counsel; and good cause appearing for the entry of this Order;

IT IS ORDERED as follows:

1. The time within which the Debtor must file its Schedules and SOFA is hereby extended to and including October 1, 2007.
2. This extension shall be without prejudice to the Debtor's right to seek further extensions, if necessary.
3. The Debtor's proposed counsel shall serve a copy of this Order on all interested parties within seven (7) days of the date hereof.