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 Proposed Attorneys to Debtor in Possession  
 Nathan and Miriam Barnert Memorial  
 Hospital Association d/b/a Barnert Hospital  
 David J. Adler (DA-0048)  
 John G. Loughnane (JL-8040)

UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEW JERSEY

In re:	:	Chapter 11
NATHAN AND MIRIAM BARNERT	:	Case No. 07-
MEMORIAL HOSPITAL ASSOCIATION,	:	
d/b/a BARNERT HOSPITAL,	:	
Debtor.	:	

**APPLICATION FOR EXPEDITED  
 CONSIDERATION OF FIRST DAY MATTERS**

On August 15, 2007, Nathan and Miriam Barnert Memorial Hospital Association d/b/a Barnert Hospital, the within debtor and debtor-in-possession (the "Debtor"), filed a petition for relief under Chapter 11 of the Bankruptcy Code.

Proposed counsel for the Debtor requests that the following relief be provided on a first day basis (check those that apply):

1.        MOTION SEEKING THE JOINT ADMINISTRATION OF MULTIPLE DEBTOR BANKRUPTCY CASES.

2.  MOTION FOR AN ORDER EXTENDING THE DEBTORS' TIME TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO FED. R. BANKR. P. 1007(c).
3.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR'S INTERIM USE OF CASH COLLATERAL AND SCHEDULING A FINAL HEARING PURSUANT TO 11 U.S.C. § 363(c)(2) AND FED. R. BANKR. P. 4001.
4.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MAINTAIN ITS EXISTING BANK ACCOUNTS AND CONTINUE USING ITS EXISTING BUSINESS FORMS AND CASH MANAGEMENT SYSTEMS.
5.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MODIFY THE INVESTMENT GUIDELINES SET FORTH IN BANKRUPTCY CODE § 345 ON AN INTERIM BASIS, PROVIDING THE UNITED STATES TRUSTEE'S OFFICE AND ANY OTHER PARTIES-IN-INTEREST A 60-DAY PERIOD TO OBJECT TO SAID ORDER BEFORE IT BECOMES A FINAL ORDER.
6.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO SATISFY, AND DIRECTING PAYROLL BANKS TO HONOR, PRE-PETITION GROSS SALARIES AND RELATED OBLIGATIONS TO THE DEBTOR'S EMPLOYEES ("PRE-PETITION PAYROLL") AND TO PAY PRE-PETITION PAYROLL AND WITHHOLDING TAXES ASSOCIATED WITH THE PRE-PETITION PAYROLL.
7.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO PAY PRE PETITION SALES, USE, PAYROLL AND OTHER TAXES THAT ARE OTHERWISE PRIORITY CLAIMS UNDER BANKRUPTCY CODE § 507.
8.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE CREDIT CARD FACILITIES.
9.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO HONOR CERTAIN PRE-PETITION CUSTOMER OBLIGATIONS, DEPOSITS, REBATES, ETC.
10.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO CONTINUE WITH AND PAY PRE-PETITION OUTSTANDING AMOUNTS DUE ON VARIOUS INSURANCE POLICIES.
11.  MOTION FOR AN ORDER AUTHORIZING PAYMENT OF OUTSTANDING AND UNPAID PRE-PETITION DEBT TO CERTAIN VENDORS WHO PROVIDE CRITICAL AND NECESSARY SERVICES AND/OR PRODUCTS TO THE DEBTOR.

12.  MOTION FOR AN ORDER (A) FOR INTERIM RELIEF PURSUANT TO 11 U.S.C. § 366(b); (B) AUTHORIZING THE PAYMENT OF ADEQUATE ASSURANCE FOR POSTPETITION UTILITY SERVICES; (C) FIXING FINAL HEARING DATE TO DETERMINE ADEQUATE ASSURANCE; AND (D) GRANTING OTHER RELATED RELIEF.
13.  MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO RETAIN A CLAIMS AND NOTICING AGENT.
14.  APPLICATION FOR DESIGNATION AS A COMPLEX CHAPTER 11 CASE.

Dated: August 15, 2007  
Newark, New Jersey

Respectfully submitted,

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

By: /s/ David J. Adler  
David J. Adler (DA-0048)  
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NOTE: Each motion or application for which expedited consideration is requested shall be filed with the Clerk of the United States Bankruptcy Court for the District of New Jersey and served upon the United States Trustee and all affected parties.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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

David J. Alder - (0048 DA)

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Proposed Attorneys to Nathan and Miriam Barnert

Memorial Hospital Association d/b/a Barnert

Hospital, Debtor-in-Possession

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 REGARDING APPLICATION FOR EXPEDITED  
CONSIDERATION OF FIRST DAY MATTERS**

The relief set forth on the following pages, numbered two (2) through four (4), is hereby  
**ORDERED.**

(Page 2)

Debtor: NATHAN AND MIRIAM BARNERT MEMORIAL HOSPITAL  
ASSOCIATION d/b/a BARNERT HOSPITAL  
Case Nos. 07-  
Caption of Order: ORDER REGARDING APPLICATION FOR EXPEDITED  
CONSIDERATION OF FIRST DAY MATTERS

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This bankruptcy case was filed on August 15, 2007. An Application For Expedited Consideration of First Day Matters was filed thereafter. After review of the initial pleadings filed in these cases which have been designated by counsel as requiring expedited consideration, and for good cause shown,

IT IS HEREBY ORDERED that the following motions are set down for hearing before the Honorable \_\_\_\_\_ in Courtroom # \_\_\_\_\_ located at 50 Walnut Street, Third Floor, Newark, New Jersey 07102 at the date and time as set forth below:

**Hearing Date and Time**

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

\_\_\_\_\_, 2007 at \_\_\_\_\_ .m.

MOTION FOR AN ORDER AUTHORIZING THE DEBTOR'S INTERIM USE OF CASH COLLATERAL AND SCHEDULING A FINAL HEARING PURSUANT TO 11 U.S.C. § 363(c)(2) AND FED. R. BANKR. P. 4001.

\_\_\_\_\_, 2007 at \_\_\_\_\_ .m.

MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO MAINTAIN ITS EXISTING BANK ACCOUNTS AND CONTINUE USING ITS EXISTING BUSINESS FORMS AND CASH MANAGEMENT SYSTEMS.

\_\_\_\_\_, 2007 at \_\_\_\_\_ .m.

MOTION FOR AN ORDER AUTHORIZING THE DEBTOR TO SATISFY, AND DIRECTING PAYROLL BANKS TO HONOR, PRE-PETITION GROSS SALARIES AND RELATED OBLIGATIONS TO THE DEBTOR'S EMPLOYEES ("PRE-PETITION PAYROLL") AND TO PAY PRE PETITION PAYROLL AND WITHHOLDING TAXES ASSOCIATED WITH THE PRE-PETITION PAYROLL.

\_\_\_\_\_, 2007 at \_\_\_\_\_ .m.

(Page 3)

Debtor: NATHAN AND MIRIAM BARNERT MEMORIAL HOSPITAL  
ASSOCIATION d/b/a BARNERT HOSPITAL

Case Nos. 07-

Caption of Order: ORDER REGARDING APPLICATION FOR EXPEDITED  
CONSIDERATION OF FIRST DAY MATTERS

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MOTION FOR AN ORDER (A) FOR INTERIM RELIEF PURSUANT TO 11 U.S.C. § 366(b); (B) AUTHORIZING THE PAYMENT OF ADEQUATE ASSURANCE FOR POSTPETITION UTILITY SERVICES; (C) \_\_\_\_\_, 2007 at \_\_\_\_\_.m. FIXING FINAL HEARING DATE TO DETERMINE ADEQUATE ASSURANCE; AND (D) GRANTING OTHER RELATED RELIEF.

APPLICATION FOR DESIGNATION AS A COMPLEX CHAPTER 11 CASE. \_\_\_\_\_, 2007 at \_\_\_\_\_.m.

MOTION FOR AN ORDER DIRECTING CREDIT CARD PROCESSORS TO HONOR PROCESSING AGREEMENTS WITH THE DEBTOR PENDING ASSUMPTION OR REJECTION PURSUANT TO 11 U.S. C. §§ 365 AND 105(A) \_\_\_\_\_, 2007 at \_\_\_\_\_.m.

MOTION FOR AN ADMINISTRATIVE FEE ORDER ESTABLISHING PROCEDURES FOR ALLOWANCE AND PAYMENT OF INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES TO PROFESSIONALS \_\_\_\_\_, 2007 at \_\_\_\_\_.m.

IT IS FURTHER ORDERED that service of the within Order shall be made in accordance with the Court's *General Order Adopting Guidelines Governing First Day Matters*; and

IT IS FURTHER ORDERED that objections and/or responses to First Day Matters, if any, shall be made in accordance with the Court's *General Order Adopting Guidelines Governing First Day Matters*.