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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

PASCACK VALLEY HOSPITAL ASSOCIATION,
INC.

Debtor.

Hon. Rosemary Gambardella

Case No. 07-23686

Chapter 11

**APPLICATION FOR AN ORDER, PURSUANT TO FED. R. BANKR. P. 9006(c)(1),
SHORTENING TIME FOR NOTICE OF HEARING ON DEBTOR'S MOTION
FOR THE ENTRY OF AN ORDER AUTHORIZING THE DEBTOR TO SELL ITS
MOBILE INTENSIVE CARE UNIT OPERATING RIGHTS AND RELATED
EQUIPMENT**

TO: HONORABLE ROSEMARY GAMBARDELLA,
UNITED STATES BANKRUPTCY JUDGE

Pascack Valley Hospital Association, Inc., the debtor and debtor-in-possession ("PVH" or the "Debtor"), by and through its attorneys, Sills Cummis & Gross P.C., submits this application (the "Application") for an order (the "Order Shortening Time"), pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), shortening time for notice of the hearing on the Debtor's motion (the "Motion") seeking the entry of an order, pursuant to sections 363 of Chapter 11, Title 11 of the United States Code (the "Bankruptcy Code") authorizing the Debtor to sell its Mobile Intensive Care Unit ("MICU") Operating Rights and related equipment (together the "MICU Assets") to Englewood Hospital

and Medical Center and The Valley Hospital or to another qualified bidder submitting a higher and better offer. In support of this Application the Debtor respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter under 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2)(A), (B) and (D).

2. The statutory basis for the relief requested in the Motion is section 365 of the Bankruptcy Code. Venue is proper in this Court pursuant to 28 U.S.C. § 1409(a).

BACKGROUND

3. On September 24, 2007 (the “Petition Date”), the Debtor filed a voluntary petition for relief pursuant to chapter 11 of title 11, United States Code (the “Bankruptcy Code”).

4. Since the Petition Date, the Debtor has remained in possession of its assets and has continued the management of its business as a debtor-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

5. The Debtor is a licensed 280-bed acute care hospital located in Bergen County, New Jersey that provides in-patient, out-patient, and related health care services to the general public. 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 Leonard Weil submitted in support of the Debtor’s various “first day” motions (the “First Day Affidavit”). Those facts are incorporated herein by reference.

RELIEF REQUESTED

6. Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure authorizes the Court, for cause shown, to reduce the normal twenty (20) day notice period for a motion provided for in D.N.J. LBR 9013-1(c). The Debtor respectfully submits that in this case cause exists to reduce the time period for notice of the hearing on the Motion.

7. PVH has filed with the New Jersey Department of Health and Senior Services (“DOHSS”) a plan for the closure of the Pascack Valley Hospital. In accordance with the closure plan, it is anticipated that PVH will close its facility on or around November 21, 2007.

8. The Debtor operates an MICU on a 24 hour per day, 7 day per week basis serving the residents of eighteen (18) communities in Bergen County, New Jersey. The Debtor wishes to transfer the MICU assets to another hospital prior to the date that the Debtor ceases operations in order to insure that there is no disruption in providing MICU services to the residents of these communities.

9. Subsequent to requesting bids from the adjacent hospitals, the Debtor entered into an Asset Purchase Agreement (“APA”) with Englewood Hospital and Medical Center and The Valley Hospital to purchase the MICU Assets for the sum of \$240,000, subject to the approval of this Court and to higher and better offers. The transfer of the MICU operating rights also requires approval of the DOHSS.

10. The Debtor requests that the Court agree to hear the Motion on shortened time to insure that the MICU assets may be transferred to a purchaser on an expedited basis so that there is no disruption or discontinuation of critical MICU services.

11. Reduction of the time period in question is not prohibited under Fed. R. Bankr. P. 9006(c)(2) and the rules listed therein.

12. No prior request for the relief sought herein has been made to this or any other court.

WHEREFORE, the Debtor respectfully requests that the Court enter the accompanying

Order Shortening Time and grant such other and further relief as the Court deems just and proper.

SILLS CUMMIS & GROSS, P.C.
Attorneys for Debtor and Debtor-in-Possession
Pascack Valley Hospital Association, Inc.

By: /s/ Jack M. Zackin
Jack M. Zackin

Dated: October 30, 2007

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorneys for the Debtor and Debtor-in-Possession

In re:

PASCACK VALLEY HOSPITAL ASSOCIATION, INC.,

Debtor.

Hon. Rosemary Gambardella

Case No. 07-23686

Chapter 11

**ORDER SHORTENING TIME FOR NOTICE OF HEARING ON DEBTOR'S
MOTION SEEKING THE ENTRY OF AN ORDER AUTHORIZING THE SALE
OF THE DEBTOR'S MOBILE INTENSIVE CARE UNIT OPERATING RIGHTS
AND RELATED EQUIPMENT**

The relief set forth on the following pages, numbered two (2) through three (3) is hereby **ORDERED**.

Debtor: PASCACK VALLEY HOSPITAL ASSOCIATION, INC..
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Caption of Order: ORDER SHORTENING TIME FOR NOTICE OF HEARING ON
DEBTOR'S MOTION SEEKING THE ENTRY OF AN ORDER
AUTHORIZING THE SALE OF THE DEBTOR'S MOBILE
INTENSIVE CARE UNIT OPERATING RIGHTS AND RELATED
EQUIPMENT

Upon consideration of the application of Pascack Valley Hospital Association, Inc., the debtor and debtor-in-possession herein ("Debtor"), for an order, pursuant to Rule 9006(c)(1) of the Federal Rules of Bankruptcy Procedure, shortening the time period for notice of the hearing (the "Hearing") on the Debtor's motion (the "Motion") seeking the entry of an order authorizing the Debtor to sell its right, title and interest in its Mobile Intensive Care Unit Operating Rights and certain related equipment pursuant to section 363 of chapter 11, Title 11 of the United States Code; and for good cause shown, it is hereby

ORDERED, that the time period required by D.N.J. LBR 9013-1(c) for notice of the Hearing be, and hereby is, shortened as set forth herein; and it is further

ORDERED, that the Hearing shall be conducted on November _____, 2007 at _____
____.m., before the Honorable Rosemary Gambardella, United States Bankruptcy Judge in the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey; and it is further

ORDERED, that true copies of this Order, the application seeking the entry thereof, and the Motion papers shall be served upon (i) the United States Trustee for Region 3, Newark, New Jersey; (ii) counsel for HFG Healthco-IV, LLC; (iii) counsel for Bank of New York, as Master Trustee; (iv) counsel for the Creditors' Committee; (v) the New Jersey Department of Health and Senior Services; (vi) counsel for the Pension Benefit Guaranty Corporation; (vii) all parties requesting notice pursuant to Fed. R. Bankr. P. 2002; and (viii) all parties to whom the Debtor sent requests to bid on the MICU assets, via ECF electronic notice, email, fax or overnight

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delivery by _____, 2007, which shall constitute good and sufficient notice of
the relief requested in the Motion; and it is further

ORDERED, that any objections to the relief requested by the Motion may be raised at
the hearing; and it is further

ORDERED, that persons wishing to present higher or better offers for the MICU Assets
may do so at the hearing, and it is further

ORDERED, that the Court will require appearances of counsel to prosecute the Motion
and any objections thereto.