

Suzanne M. Klar, Esq. (SK4388)  
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(973) 430-6483  
Attorney for Creditor  
Public Service Electric & Gas Company  
File No.: B2007-00525

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE:

**PASCACK VALLEY HOSPITAL  
ASSOCIATION, INC.,**

**CHAPTER 11**

**Case No.: 07-23686 (RG)**

**Debtor.**

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**NOTICE OF MOTION FOR ENTRY OF AN ORDER COMPELLING THE  
DEBTOR TO PAY THE ADMINISTRATIVE CLAIM OF PUBLIC SERVICE  
ELECTRIC AND GAS COMPANY ("PSE&G") UNDER §503 OF THE  
BANKRUPTCY CODE**

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**PLEASE TAKE NOTICE** that Public Service Electric and Gas Company ("Public Service"), by its undersigned counsel will move this Court before the Honorable Rosemary Gambardella, at US Bankruptcy Court, Newark, NJ on the 22<sup>nd</sup> day of April, 2008 at 11 o'clock in the forenoon of that day, or as soon thereafter as counsel may be heard, for entry of an Order compelling payment by Pascack Valley Hospital Association, Inc. ("Debtor"), of the administrative expense claim of Public Service for post-petition utility service provided by Public Service to the Debtor.

~~PLEASE TAKE FURTHER NOTICE~~ that Public Service shall rely on the application submitted herewith in support of the relief requested. A proposed form of Order is also submitted.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested only if opposition is filed.

**PLEASE TAKE FURTHER NOTICE** that any opposition to the motion of Public Service must be filed in writing with the Clerk of the United States Bankruptcy Court and served upon the undersigned counsel to Public Service so as to be received at least seven days prior to the hearing date pursuant to D.N.J. LBR9013-1(d). If no opposition is timely filed, the relief requested may be granted.

Dated: March 28, 2008

/s/Suzanne M. Klar  
Suzanne M. Klar  
Attorney for Public Service Electric  
and Gas Company

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FOR THE DISTRICT OF NEW JERSEY

IN RE:

**PASCACK VALLEY HOSPITAL  
ASSOCIATION, INC.,**

**CHAPTER 11**

**Case No.: 07-23686 (RG)**

Debtor.

---

**CERTIFICATION IN SUPPORT OF MOTION FOR ENTRY OF AN ORDER  
COMPELLING THE DEBTOR TO PAY THE ADMINISTRATIVE CLAIM OF  
PUBLIC SERVICE ELECTRIC AND GAS COMPANY ("PSE&G") UNDER §503  
OF THE BANKRUPTCY CODE AND AUTHORIZING AND COMPELLING  
THE DEBTOR TO PAY AN ADEQUATE ASSURANCE PAYMENT TO PSE&G**

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Nancy Oliveras, being of full age, hereby certifies as follows:

1. I am a Credit and Collections Representative in the Collection and Call Management Center of Public Service Electric and Gas Company (hereinafter referred to as "Public Service").

2. I am fully familiar with the account of the debtor, Pascack Valley Hospital Association, Inc. (hereinafter referred to as the "Debtor") based upon personal knowledge and knowledge gained by my review of records maintained by Public Service in the ordinary course of its business.

3. Public Service supplied Debtor with utility services at the property set forth in Exhibit "A" (hereinafter referred to as the "Property") in accordance with its Tariffs.

4. Public Service established accounts for electric and gas service in the name of the Debtor in accordance with its Tariffs.

5. The Debtor used and consumed utility services supplied by Public Service at the Property and continues to do so.

6. Public Service billed the Debtor on a monthly basis in accordance with its Tariffs.

7. Public Service continues to supply utility services to the Debtor at the Property.

8. Attached hereto as Exhibit "A" are true copies of the account statements of the Debtor's accounts and the balances owed on the accounts.

9. As set forth in Exhibit "A", the total balance due to Public Service from the Debtor, for utility services provided to the Property, is \$276,554.19 for bills issued as of March 1, 2008.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: March 28, 2008

  
Nancy Oliveras  
Public Service Electric & Gas Company

**EXHIBIT "A"**

PASCACK VALLEY HOSP DIP      01 41 005 955 81      STATUS ACTIVE      CS ACTIVITY Y  
 250 OLD HOOK RD      RATE TSGNF  
 WESTWOOD NJ      07675-3181 DEP Y      03-27-08 11:14:32      PRIORITY 0  
 \* \* GENERAL INQUIRY \* \*      PAGE 01

METER READING DATA

LAST READ DATE 030108      LAST BILL DATE 030108      NO ER 00      SCRAP NO  
 KEY LOC UNUS COND

COLLECTION DATA

ASSMT      CREDIT CD      REMDR NO      NOTICE NO      COLL ORD NO      DEP NOT NO

MISCELLANEOUS DATA

CLASS BUS COM      PEND COMPLAINT NO      PREV COMPLAINT NO      APPL CYCLING CR NO

\* \* \* TRANSACTIONS      EQUAL PAYMENT PLAN NONE      \* \* \*

DATE	TRAN	DEBIT	CREDIT	BATCH	SEQ	BALANCE
031808	SADJ	5650.14				50685.90
030108	BILL	5572.46				45035.76
030708	EPAY*		3920.53	3517	0100	39463.30
022308	LPCH	257.35				43383.83
022508	SADJ	5853.74				43126.48
020108	SBIL	8582.10				37272.74
021508	SADJ		3911.96			28690.64
020108	BILL	3911.96				32602.60

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U 022508

PASCACK VALLEY HOSP DIP \* 18 41 806 064 10 STATUS ACTIVE CS ACTIVITY Y  
 250 OLD HOOK RD RATE MD  
 WESTWOOD NJ 07675-3123 DEP Y 03-27-08 11:14:51 PRIORITY 0  
 \* \* GENERAL INQUIRY \* \* PAGE 01

METER READING DATA

LAST READ DATE 122807 LAST BILL DATE 022808 NO ER 00 SCRAP NO  
 KEY LOC UNUS COND TRAF BOX

COLLECTION DATA

ASSMT 5 CREDIT CD 1 REMDR NO NOTICE YES COLL ORD NO DEP NOT NO

MISCELLANEOUS DATA

CLASS BUS COM PEND COMPLAINT NO PREV COMPLAINT NO APPL CYCLING CR NO

* * * TRANSACTIONS			EQUAL PAYMENT PLAN NONE			* * *
DATE	TRAN	DEBIT	CREDIT	BATCH	SEQ	BALANCE
030708	EPAY*		113.13	3517	0097	273.07
022908	SBIL	806.88				386.20
030308	SADJ		646.93	9996	9999	420.68CR
022908	BILL		0.00			226.25
013008	BILL	646.93				226.25
122807	BILL	516.42				420.68CR
121107	LPCH	0.88				937.10CR
121407	TR W		1551.49	0602	0001	937.98CR

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S 102607

PASCACK VALLEY HOSP DIP \* 18 41 806 067 12 STATUS ACTIVE CS ACTIVITY Y  
 250 OLD HOOK RD RATE MD HS  
 WESTWOOD NJ 07675-3123 DEP Y 03-27-08 11:15:08 PRIORITY 0  
 \* \* GENERAL INQUIRY \* \* PAGE 01

METER READING DATA

LAST READ DATE 022908 LAST BILL DATE 022908 NO ER 00 SCRAP NO  
 KEY LOC UNUS COND

COLLECTION DATA

ASSMT 5 CREDIT CD 2 REMDR NO NOTICE YES COLL ORD YES DEP NOT NO

MISCELLANEOUS DATA

CLASS BUS COM PEND COMPLAINT NO PREV COMPLAINT NO APPL CYCLING CR NO

\* \* \* TRANSACTIONS

EQUAL PAYMENT PLAN NONE \* \* \*

DATE	TRAN	DEBIT	CREDIT	BATCH	SEQ	BALANCE
030708	EPAY*		1323.10	3517	0096	2808.81
022908	BILL	1470.06				4131.91
021208	LPCH	15.66				2661.85
013008	BILL	1540.32				2646.19
122807	BILL	1611.72				1105.87
112807	BILL	1794.15				505.85CR
111407	EPAY		2979.09	1034	0261	2300.00CR
103007	EPAY		330.77	1109	0055	679.09

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PASCACK VALLEY HOSP DIP \* 18 41 806 952 94 STATUS ACTIVE CS ACTIVITY Y  
OLD HOOK RD RATE GSG LPLP  
WESTWOOD NJ 07675-0000 DEP Y 03-27-08 11:15:28 PRIORITY 0  
\* \* GENERAL INQUIRY \* \* PAGE 01

METER READING DATA

LAST READ DATE 022908 \* LAST BILL DATE 022908 NO ER 00 SCRAP NO  
KEY LOC UNUS COND

COLLECTION DATA

ASSMT CREDIT CD REMDR NO NOTICE NO COLL ORD NO DEP NOT NO

MISCELLANEOUS DATA

CLASS BUS COM PEND COMPLAINT NO PREV COMPLAINT NO APPL CYCLING CR NO

\* \* \* TRANSACTIONS

EQUAL PAYMENT PLAN NONE \* \* \*

DATE	TRAN	DEBIT	CREDIT	BATCH	SEQ	BALANCE
030708	EPAY*		21404.40	3517	0098	184811.73
022908	BILL	65197.88				206216.13
022808	FACI	70.99				141018.25
021208	LPCH	979.46				141018.25
013008	BILL	70867.62				140038.79
012908	FACI	70.99				69171.17
122807	BILL	69171.17				69171.17
122807	FACI	70.99				

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PASCACK VALLEY HOSP DIP      18 41 806 971 73      STATUS ACTIVE      CS ACTIVITY Y  
 OLD HOOK RD      RATE LPLS  
 WESTWOOD NJ      07675-3181 DEP Y      03-27-08 11:15:48      PRIORITY 0  
 \* \* GENERAL INQUIRY \* \*      PAGE 01

METER READING DATA

LAST READ DATE 122807      LAST BILL DATE 022808      NO ER 00      SCRAP NO  
 KEY LOC UNUS COND

COLLECTION DATA

ASSMT      CREDIT CD      REMDR NO      NOTICE NO      COLL ORD NO      DEP NOT NO

MISCELLANEOUS DATA

CLASS BUS COM      PEND COMPLAINT NO      PREV COMPLAINT NO      APPL CYCLING CR NO

\* \* \* TRANSACTIONS      EQUAL PAYMENT PLAN NONE      \* \* \*

DATE	TRAN	DEBIT	CREDIT	BATCH	SEQ	BALANCE
032708	DTOT	40057.00				78031.68
030708	EPAY*		0.43	3517	0099	37974.68
011308	LPCH	328.26				37975.11
122807	BILL	14464.57				37646.85
112807	BILL	23182.28				23182.28
111507	EPAY		35516.10	1078	0179	0.00
102607	SBIL	35516.10				35516.10

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---

**ORDER COMPELLING THE DEBTOR TO PAY THE ADMINISTRATIVE  
CLAIM OF PUBLIC SERVICE ELECTRIC AND GAS COMPANY ("PSE&G")  
UNDER §503 OF THE BANKRUPTCY CODE**

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~~THIS MATTER~~ having been opened to the Court by Suzanne M. Klar, Esq., counsel for Public Service Electric and Gas Company ("Public Service") upon its motion (the "Motion") for entry of an Order compelling payment by Pascack Valley Hospital Association, Inc. ("Debtor") of the administrative expense claim of Public Service for post-petition utility service provided by Public Service to the Debtor; and a hearing having been held to consider the relief sought by Public Service in its Motion, and the Court having heard and considered the arguments of counsel (if any) at the hearing on the Motion; and the Court having considered all papers submitted in support of and in opposition to the relief sought by Public Service in the Motion, and due deliberation having been had thereon; and good and sufficient cause appearing therefore,

**ORDERED** that, the Debtor is, and hereby is, directed and compelled to make payment to Public Service within ten (10) days hereof in the amount of \$276,554.19 on account of the administrative expense claim of Public Service for the provision of utility services incurred through March 1, 2008 hereof as awarded herein.