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

In re:

HUDSON HEALTHCARE, INC.,

Debtor.

Case No. 11-33014 (DHS)

Chapter 11

**NOTICE OF MOTION OF THE HOBOKEN MUNICIPAL HOSPITAL AUTHORITY
TO QUASH SUBPOENA SERVED ON SILLS CUMMIS & GROSS P.C.**

PLEASE TAKE NOTICE that on the 18th day of October 2011 at 10:00 a.m. (Prevailing Eastern Time), or as soon thereafter as counsel may be heard, the undersigned special counsel to the Hoboken Municipal Hospital Authority (the "Authority") will move (the "Motion") before the Honorable Donald H. Steckroth, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, Dr. Martin Luther King, Jr. Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey 07101, for entry of an order quashing the subpoena dated September 24, 2011 served by Riker Danzig Scherer Hyland & Peretti LLP, as counsel for JNESO District Council 1, IUOE, AFL-CIO upon Sills Cummis & Gross P.C., counsel for the Official Committee of Unsecured Creditors of the above-captioned debtor and debtor-in-possession (the "Committee").

PLEASE TAKE FURTHER NOTICE that in support of the relief requested in the Motion, the Authority will rely on the Application filed contemporaneously herewith.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. Local Bankruptcy Rule 9013-2, no brief is being filed in support of the Motion, as the legal principles involved are not novel or disputed and are adequately set forth in the accompanying Application.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall (i) be in writing; (ii) specify with particularity the basis therefor; and (iii) be filed with the Clerk of the United States Bankruptcy Court, electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the *General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents* dated March 27, 2002 (the “General Order”), and the *Commentary Supplementing Administrative Procedures* dated as of March 2004 (the “Supplemental Commentary”) (the General Order, Supplemental Commentary and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court), and by all other parties in interest, and shall be served on Lowenstein Sandler PC, 65 Livingston Avenue, Roseland, New Jersey 07068 (Attention: Mary E. Seymour, Esq. and Paul Kizel, Esq.) no later than seven (7) days prior to the return date.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. Local Bankruptcy Rule 9013-1(a) and the relief sought therein may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. Local Bankruptcy Rule 9013-1(k), in the event the Motion is contested, there is a duty to confer to determine whether a

