

On July 24, 2017, Debtor filed a lawsuit against the hospital in Portland, Oregon, asserting breach of contract and seeking to recover damages and costs in excess of \$4,000,000.00. On Schedule A/B, Debtor lists a cause of action against the Department of Veteran Affairs, but states that the value is "Unknown." Schedule A/B, Question 74; Dckt. 24.

No motion to seek the employment of litigation counsel to advocate for the Bankruptcy Estate to aggressively litigate to recover the \$4,100,000 in asserted damages has been filed by Debtor in Possession. Debtor in Possession has filed a Motion to Use Cash Collateral so that Debtor in Possession can be authorized to pay a shareholder of Debtor \$4,000.00 per month to provide services, presumably to the Bankruptcy Estate, in a case in which there are no ongoing business operations.

At the Status Conference, **XXXXXXXXXXXXXXXXXXXXXXXXXXXX**.