

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
OWENSBORO DIVISION

FORBA HOLDINGS, LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 4:08-cv-00137-JHM-ERG
	)	
DEBBIE HAGAN,	)	
	)	
Defendant.	)	

**MOTION FOR HEARING ON PLAINTIFF’S MOTION FOR SANCTIONS**

The plaintiff, now known as Church Street Health Management, LLC (FORBA Holdings, LLC changed its name to Church Street Health Management, LLC effective December 31, 2010; hereinafter “Plaintiff”), pursuant to LR 7.1(f), respectfully moves this Court to set a hearing on Plaintiff’s contemporaneously filed Motion for Sanctions, to Enforce Consent Injunction, to Show Cause as to Why Defendant Should Not Be Held in Contempt, to Hold Defendant in Contempt, for Award of Attorney’s Fees, the Imposition of Fines and Other Relief [Docket No. 40]. As grounds for this motion, Plaintiff states that in light of Defendant’s continuing violations of the Consent Injunction, it is necessary that the Court set a show cause hearing at which Defendant should be ordered to show cause why she should not be held in contempt of Court.

Respectfully submitted,

/s/ Thor Y. Urness

Thor Y. Urness (admitted *pro hac vice*)  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Motion for Hearing on Plaintiff's Motion for Sanctions is being served, via U.S. Mail, first class postage prepaid, on this the 2nd day of July, 2011, on:

Debbie Hagan  
4453 Strickland Drive  
Owensboro, KY 42301-6519

/s/ Thor Y. Urness

Thor Y. Urness