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February 12, 2001

VIA OVERNIGHT MAIL

Richard Lucarell
Deputy Clerk-in-Charge
U.S. Bankruptcy Court
Northern District of Ohio
Eastern Division
Federal Building & U.S. Courthouse
125 Market Street, P.O. Box 147
Youngstown, OH 44503

Re: Youngstown Osteopathic Hospital Association
Case No. 99-40663, Chapter 11, Judge Bodoh

Dear Clerk Lucarell:

We are enclosing the original and four copies of a Memorandum of Ohio Nurses Association Opposing Motion for Extension regarding the above-mentioned case. Kindly return to us a time-stamped copy of same in the enclosed envelope provided herein. Thanks for your attention to this matter.

Sincerely yours,



Frederick G. Cloppert, Jr.

FGC/nab
Enclosures

cc: All Counsel of Record

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In re	:	Chapter 11
YOUNGSTOWN OSTEOPATHIC HOSPITAL ASSOCIATION	:	Judge William T. Bodoh
Debtor.	:	Case No. 99-40663

**MEMORANDUM OF OHIO NURSES ASSOCIATION OPPOSING
MOTION FOR AN EXTENSION.**

The Ohio Nurses Association (ONA) opposes the Debtor's Motion for Further Extension of Time In Which To Respond To Motion For Allowance Filed By The Ohio Nurses Association.

1. On or about November 2, 2000, ONA filed its Motion for Allowance seeking entry of an order allowing certain fringe benefits due to certain of its members under the terms of a collective bargaining agreement between ONA and the Debtor as Chapter 11 administrative expenses/super priority status. The Court has previously granted Debtor one extension for leave to respond.

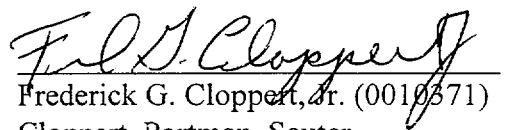
2. Debtor, in the alternative, makes two arguments for the extension. The amount of benefits owed the claimants, approximately 70-75 nurses, is not readily ascertainable and needs to be determined by a review of the record between Debtor and counsel for ONA. Debtor seeks an extension because of the limited staff remaining, preventing it from completely reviewing its records. Debtor is able, from a review of ONA's motion and a cursory review of its records, to ascertain the nature of the fringe benefits seeking treatment as administrative

expenses. It is not necessary at this time to undertake an exhaustive review to respond to ONA's motion.

3. Debtor also argues that ONA's motion presents issues similar or identical to one this court has already ruled on, currently pending on appeal before the Sixth Circuit in Youngstown Osteopathic Hospital Association v. Teamsters Local Union No. 377, Health and Welfare Fund, Case No. 00-4195. It notes that the briefs have been submitted, but oral argument has not even been scheduled. If this case has not even been scheduled for oral argument, an extension until April 30 will not enable the Court to have a written opinion deciding that case to assist it. If the Debtor is claiming that the issue is identical to the one pending before the Sixth Circuit, then it should make this admission; and the Court will treat this motion accordingly.

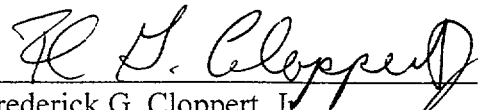
For these reasons we urge the Court to deny this second request for an extension of time to respond to ONA's motion.

Respectfully submitted,


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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing Memorandum of ONA Opposing Motion for an Extension was served by first class U.S. mail, postage prepaid, upon the following, this 12 day of February 2001.


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