

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

RECEIVED

2009 NOV -9 AM 9:37

T.R.A. DOCKET ROOM

IN RE:

SHOW CAUSE PROCEEDING  
AGAINST HEALTHCARE ADVANTAGE LLC/  
THE SELECT GROUP/CHRIS WIGGINS

DOCKET NO.  
09-00036

**MOTION OF RESPONDENTS HEALTHCARE ADVANTAGE LLC, THE SELECT  
GROUP AND CHRIS WIGGINS FOR EXTENSION OF TIME TO ANSWER SHOW  
CAUSE ORDER**

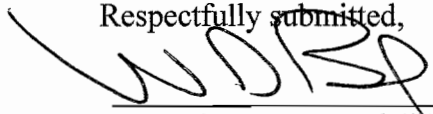
Come the Respondents Healthcare Advantage LLC, The Select Group and Chris Wiggins  
(collectively, "Respondents") and would show as follows:

1. A fifty-nine (59) page Order requiring Respondents to appear and show cause why a Cease and Desist Order and/or fine should not be imposed was issued under date of October 9, 2009 and was hand delivered to the undersigned counsel on October 9, 2009.
2. The Order directed Respondents to respond within thirty (30) days of the issuance of the Order.
3. The Order is lengthy and involves a large number of complainants.
4. The undersigned counsel contacted Gary Hotvedt who represents the Tennessee Regulatory Authority to request an extension of time, and Mr. Hotvedt stated he had no objection to extending the time until Friday, November 13, 2009.
5. The undersigned counsel is still making arrangement with Respondents to represent them in this matter and needs additional time to complete the engagement.
6. The undersigned counsel needs additional time to review the lengthy Order and discuss defenses with Respondents.

7. Upon the advice of Mr. Hotvedt, counsel contacted the Honorable Hearing Officer Kelly Cashman-Grams to discuss the matter, who agreed to the extension if the appropriate motion was filed.

Premises considered, Respondents move for an extension of time within which to answer the Order, said extension to be Friday, November 13, 2009.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'WDB', is written over a horizontal line.

W. Davidson Broemel (#3606)  
Burr & Forman LLP  
700 Two American Center  
3102 West end Avenue  
Nashville, TN 37203  
Telephone: (615) 724-3212  
Facsimile: (615) 724-3290  
Email: [DBroemel@burr.com](mailto:DBroemel@burr.com)

Counsel for Respondents

### CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing MOTION OF RESPONDENTS HEALTHCARE ADVANTAGE LLC, THE SELECT GROUP AND CHRIS WIGGINS FOR EXTENSION OF TIME TO ANSWER SHOW CAUSE ORDER has been served on the following by hand delivering same to their office addresses, on this the 23 day of November, 2009:

Mr. Gary Hotvedt  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505



---

W. Davidson Broemel (#3606)  
Burr & Forman LLP  
700 Two American Center  
3102 West end Avenue  
Nashville, TN 37203  
Telephone: (615) 724-3212  
Facsimile: (615) 724-3290  
Email: [DBroemel@burr.com](mailto:DBroemel@burr.com)