

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
ABC DENTISTRY, P.A., et al.,¹	§	CHAPTER 11
DEBTORS.	§	
	§	CASE NO. 16-34221
	§	Jointly Administered
	§	

**DEBTORS' SECOND AMENDED WITNESS & EXHIBIT LIST FOR HEARING ON
CONFIRMATION OF SECOND AMENDED JOINT CHAPTER 11 PLAN**

ABC Dentistry, P.A. and its debtor affiliates, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), by their undersigned counsel, submit the following witness and exhibit list for the combined hearing on confirmation of the Debtors’ Second Amended Joint Chapter 11 Plan, scheduled for December 13, 2017 at 1:30 p.m. (CDT) in the above-captioned bankruptcy case before the Honorable Marvin J. Isgur, United States Bankruptcy Judge, Courtroom 404, 515 Rusk Street, Houston, Texas 77002.

WITNESS LIST

The Debtors may call the following witnesses:²

1. Iraj S. Jabbary;
2. John D. Baumgartner, CIRA, CDBV (Stout Risius Ross, Inc.);
3. Brad Daniel (BMC Group, Inc.);
4. Omar J. Alaniz (Baker Botts L.L.P.);
5. Any witness listed, offered, or called by any other party; and
6. Any witness required for rebuttal or impeachment.

¹ The Debtors in these chapter 11 cases are: ABC Dentistry, P.A.; ABC Dentistry West Orem, P.L.L.C.; and ABC Dentistry Old Spanish Trail, P.L.L.C.

² If witnesses 1-4 testify, they will do so as fact witnesses. John Baumgartner will also provide expert testimony.

EXHIBIT LIST

#	Description	Offered	Objection	Admitted	Disposition
1	Second Amended Joint Chapter 11 Plan of Reorganization of ABC Dentistry, P.A., ABC Dentistry West Orem, P.L.L.C., ABC Dentistry Old Spanish Trail, P.L.L.C., ABC Dentistry Hillcroft, P.L.L.C., ABC Dentistry Pasadena, P.A., and Iraj s. Jabbary, DDS, as Modified on December 11, 2017 [Dkt. No. 349, Filed 12/11/2017]				
2	Redline of Debtors' Modified Second Amended Plan against the Debtors' Solicited Plan				
3	Second Amended Disclosure Statement under 11 U.S.C. § 1125 and Bankruptcy Rule 3016 in Support of Joint Plan of Reorganization of ABC Dentistry, P.A., ABC Dentistry West Orem, P.L.L.C., ABC Dentistry Old Spanish Trail, P.L.L.C., ABC Dentistry Hillcroft, P.L.L.C., ABC Dentistry Pasadena, P.A., and Iraj s. Jabbary, DDS [Dkt. No. 311, Filed 10/6/2016]				
4	Form of Rohi Settlement and State Release Agreement [Dkt. No. 347, Exhibit 1, Filed 11/22/17]				
5	Form of Promissory Note [Dkt. No. 347, Exhibit 2, Filed 11/22/17]				
6	Form of Security Agreement [Dkt. No. 347, Exhibit 3, Filed 11/22/17]				
7	Schedule of Rejected Contracts [Dkt. No. 347, Exhibit 4, Filed 11/22/17]				
8	Schedule of Cure Amounts for Assumed Contracts, [Dkt. No. 347, Exhibit 5, Filed 11/22/17]				

#	Description	Offered	Objection	Admitted	Disposition
9	Schedule of Retained Causes of Action [Dkt. No. 347, Exhibit 6, Filed 11/22/17]				
10	Schedule of Debtors' Post-Effective Date Officers and Directors [Dkt. No. 347, Exhibit 7, Filed 11/22/17]				
11	Certificate of Service of Second Amended Disclosure Statement and Solicitation Materials [Dkt. 342, filed on 11/7/17]				
11-A	Notice of (I) Approval of Disclosure Statement, (II) Deadline for Voting on Plan, (III) Hearing to Consider Confirmation of Plan, and (IV) Deadline for Filing Objections to Confirmation of Plan [Dkt. No. 342, Exhibit 3, Filed 11/17/17]				
11-B	Notice of (I) Approval of Disclosure Statement, (II) Hearing to Consider Confirmation of Plan, and (III) Deadline for Filing Objections to Confirmation of Plan [Dkt. No. 342, Exhibit 4, Filed 11/17/17]				
12	Notice of (I) Approval of Disclosure Statement, (II) Deadline for Voting on Plan, (III) Hearing to Consider Confirmation of Plan, and (IV) Deadline for Filing Objections to Confirmation of Plan [Dkt. No. 343, Exhibit 3, Filed 11/20/17]				
13	Certificate of Service of Final Order (I) Authorizing the Use of Cash, Including Cash Collateral; (II) Finding that the Interests of Any Party that is Purportedly Secured is Adequately Protected; and (III) Granting Related Relief [Dkt. No. 103, Filed 10/6/16]				

#	Description	Offered	Objection	Admitted	Disposition
14	Declaration of Iraj S. Jabbarly in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization for ABC Dentistry, P.A., and its Debtor Affiliates [Dkt. No. 346, Filed 12/12/2017]				
15	Declaration of Brad Daniel of BMC Group Inc. Regarding Solicitation of Votes on the Joint Plan of Reorganization for ABC Dentistry, P.A. and its Debtor Affiliates [Dkt. No. 353, Filed on 12/12/2017]				
16	Declaration of John D. Baumgartner of Stout Risius Ross, Inc. in Support of the Joint Plan of Reorganization for ABC Dentistry, P.A. and its Debtor Affiliates [Dkt. No. 351, Filed 12/12/2017]				
17	Declaration of Omar J. Alaniz of Baker Botts L.L.P. in Support of the Joint Plan of Reorganization for ABC Dentistry, P.A. and its Debtor Affiliates [Dkt. No. 352, Filed on 12/12/2017]				
18	Proposed Findings of Facts, Conclusions of Law, and Order Confirming the Second Amended Plan of Reorganization of ABC Dentistry P.A. and its Debtor Affiliates, as Modified on 12/12/17.				
19	Redline of Modified Confirmation Order against version of Confirmation Order filed on 12/12/17 at Dkt. No. 345				
20	Order on Relator's Motion for Partial Summary Judgement				
21	Settlement Agreement Amortization Schedule				
22	Amended Term Sheet re Rohi Settlement, dated as of 7-26-17				
23	Class 3 Ballot				

#	Description	Offered	Objection	Admitted	Disposition
24	Class 6 Ballot				
25	Class 7 Ballots				
26	Second Amended Petition				
27	Litigation Defendants Financial Projections				
28	Any exhibits listed, designated, or offered by any other party.				
29	Any exhibits necessary for rebuttal.				

The Debtors reserve the right to modify, amend or supplement this Witness and Exhibit List at any time prior to the combined hearing. The Debtors further reserve the right to ask the Court to take judicial notice of pleadings, transcripts, and/or documents filed in or in connection with these chapter 11 cases.

Dated: December 13, 2017

BAKER BOTTS L.L.P.

/s/ Omar J. Alaniz_____

BAKER BOTTS L.L.P.

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