

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

In re:

Curae Health, Inc., *et al.*<sup>1</sup>

1721 Midpark Road, Suite B200  
Knoxville, TN 37921

Debtors.

Chapter 11

Case No. 18-05665

Judge Walker

Jointly Administered

**FIRST SUPPLEMENTAL DECLARATION OF MICHAEL E. COLLINS**

I, Michael E. Collins, make this declaration (the “Supplemental Declaration”) pursuant to 28 U.S.C. § 1746 and state:

1. I am an attorney at law and a Member of the law firm Manier & Herod, P.C. (“M&H”). I submit this Supplemental Declaration to supplement my prior declaration that was submitted in support of the *Application to Retain and Employ Manier & Herod, P.C. as Co-Counsel to Represent the Official Committee of General Unsecured Creditors of Curae Health, Inc., et. al. Nunc Pro Tunc to September 6, 2018* (the “Initial Declaration”) [Docket No. 188, Ex. A].

2. Unless otherwise stated in this Supplemental Declaration, I have personal knowledge of the facts set forth herein. To the extent any information disclosed herein requires amendment or modification upon completion of further review by M&H, or as additional

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Curae Health, Inc. (5638); Amory Regional Medical Center, Inc. (2640); Batesville Regional Medical Center, Inc. (7929); and Clarksdale Regional Medical Center, Inc. (4755); Amory Regional Physicians, LLC (5044); Batesville Regional Physicians, LLC (4952); Clarksdale Regional Physicians, LLC (5311).

information becomes available, a supplemental affidavit will be submitted to the Court<sup>2</sup> reflecting such amended or modified information.

3. I submit this Supplemental Declaration to disclose certain additional information that has become available to M&H since the filing of the Initial Declaration. Specifically, M&H has determined that the following party and/or certain of its affiliates, which were not identified in the Initial Declaration, are M&H clients in matters unrelated to these cases:

- (a) Chubb Limited Insurance Company (collectively, with its subsidiaries and affiliates (“**Chubb**”).

4. M&H presently represents Chubb in numerous other matters unrelated to the Debtors’ cases. Based on M&H’s substantial representation of Chubb in unrelated matters, the Committee will be seeking to employ additional local counsel to assist Sills Cummis & Gross P.C. with any action related to claims potentially covered by insurance policies issued by Chubb.

5. I understand that there is a continuing duty to disclose any adverse interest or change in disinterestedness. M&H will from time to time review its disclosures in these cases, and in the event that additional material connections are discovered, the firm will disclose such information to the Court on notice to parties-in-interest and the United States Trustee.

I certify under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonably inquiry, the foregoing is true and correct.

Dated: May 14, 2019  
Nashville, Tennessee

/s/ Michael E. Collins  
Michael E. Collins

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<sup>2</sup> Any capitalized terms not defined in this Supplemental Declaration shall have the meanings ascribed them in the *Application to Retain and Employ Manier & Herod, P.C. as Co-Counsel to Represent the Official Committee of General Unsecured Creditors of Curae Health, Inc., et. al. Nunc Pro Tunc to September 6, 2018* [Docket No. 188].