

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

In re:

Curae Health, Inc., *et al.*¹

1721 Midpark Road, Suite B200
Knoxville, TN 37921

Debtors.

Chapter 11

Case No. 18-05665

Judge Walker

Jointly Administered

FIRST SUPPLEMENTAL DECLARATION OF ANDREW H. SHERMAN

I, Andrew H. Sherman, 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 Sills Cummis & Gross P.C. (“Sills”). I submit this Supplemental Declaration to supplement my prior declaration that was submitted in support of the *Application of Official Committee of Unsecured Creditors for Authority to Retain and Employ Sills Cummis & Gross P.C. as Co-Counsel Nunc Pro Tunc to September 6, 2018* (the “Initial Declaration”) [Docket No. 189, 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 Sills, or as additional information becomes available, a supplemental affidavit will be submitted to the Court² reflecting such amended or modified information.

¹ 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).

² Any capitalized terms not defined in this Supplemental Declaration shall have the meanings ascribed them in the *Application of Official Committee of Unsecured Creditors for Authority to Retain and Employ Sills Cummis & Gross P.C. as Co-Counsel Nunc Pro Tunc to September 6, 2018* [Docket No. 189].

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

- (a) Chubb Group of Insurance Companies (collectively, with its subsidiaries and affiliates (“**Chubb**”).

4. Sills’s representation of Chubb in such unrelated matters constituted less than 0.1% of Sills’s revenues for the last complete fiscal year (the fiscal year ending September 30, 2018), and has constituted less than 0.1% of Sills’s revenues for the current fiscal year to date.

5. To the extent that the connection identified in paragraph 3 above results in any conflict in these cases or any related adversary proceedings, the Committee will be represented by other appropriate counsel.

6. I understand that there is a continuing duty to disclose any adverse interest or change in disinterestedness. Sills 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
Newark, New Jersey

/s/ Andrew H. Sherman
Andrew H. Sherman