

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

In re:)	
)	Chapter 11
Curae Health, Inc., <i>et al.</i> ¹)	Case No. 18-05665
)	
1721 Midpark Road, Suite B200)	Judge Walker
Knoxville, TN 37921)	
Debtors.)	Jointly Administered

THE DEADLINE FOR FILING A TIMELY RESPONSE IS: JULY 15, 2019

IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: JULY 23, 2019 AT 9 A.M. CST, COURTROOM 2, CUSTOMS HOUSE, UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, 701 BROADWAY, 2ND FLOOR, NASHVILLE, TENNESSEE 37203

**SERVISFIRST BANK’S LIMITED OBJECTION
TO THE FINAL FEE APPLICATION
OF POLSINELLI, P.C.**

ServisFirst Bank, by and through counsel, hereby files this Limited Objection (the “Limited Objection”) to the Final Fee Application of Polsinelli, P.C. for Compensation and Reimbursement of Expenses as Counsel to the Debtors and Debtors-in-Possession for the Period from August 24, 2018 through June 11, 2019 (the “Fee Application”) [Docket No. 1155].

In furtherance hereof, ServisFirst Bank hereby states as follows:

1. ServisFirst Bank objects to the Fee Application because counsel to the Debtors and the Debtors’ financial advisor GlassRatner, have failed to provide to ServisFirst Bank the required

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).

reports set forth in the Expedited Agreed Order (I) Authorizing the Use of Cash Collateral; (II) Granting Adequate Protection; (III) Modifying the Automatic Stay; and (IV) Granting Related Relief entered by this Court on April 26, 2019 as Docket No. 973 (the “Cash Collateral Order”).

2. Pursuant to paragraph number 5 of the Cash Collateral Order, the Debtors agreed to provide Weekly Budget Reports, as defined therein, on a weekly basis. Upon information and belief, the last Weekly Budget Report was received by ServisFirst for period ending on or about April 19, 2019. Since that time, the Debtors have failed to provide the Weekly Budget Report although requested by counsel to ServisFirst Bank. Additionally, ServisFirst Bank, by and through counsel, requested a final report at the conclusion of the Chapter 11 cases describing the final outcome of receipts and disbursements compared to the budget. Debtors have also failed to provide the final budget report requested by ServisFirst Bank. ServisFirst Bank asserts that this is a reasonable request.

3. ServisFirst Bank objects to the payment of fees to Debtors’ counsel until such time as Debtors’ counsel and the financial advisor to the Debtors, GlassRatner, have completed the work that was agreed upon in the Cash Collateral Order.

WHEREFORE, ServisFirst Bank hereby respectfully requests that this Court sustain this Limited Objection and order the Debtors by and through Debtor’s counsel and Debtor’s Financial Advisor, GlassRatner, to provide the Weekly Budget Reports through confirmation and the final budget report requested by ServisFirst Bank; and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

NEAL & HARWELL, PLC

By: /s/ David G. Thompson
David G. Thompson, BPR #20309
James R. Kelley, BPR #5525
Stephen M. Montgomery, BPR #26489
Neal & Harwell, PLC
1201 Demonbreun Street, Suite 1000
Nashville, TN 37203
dthompson@nealharwell.com
jkelley@nealharwell.com
(615) 244-1713 Telephone
(615) 726-0573 Facsimile

Counsel for ServisFirst Bank

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Limited Objection has been served through the Bankruptcy Court's ECF system on all parties registered to receive electronic notice in this case on this the 15th day of July, 2019.

/s/ David G. Thompson