

# EXHIBIT B

**From:** [Michael Collins](#)  
**To:** ["steven.mindy@katten.com"](mailto:steven.mindy@katten.com)  
**Cc:** [McClurg, Diana S](#); [Steven Sass](#); [David Lopater](#); [lynnksmalley@aol.com](mailto:lynnksmalley@aol.com); [Tim Brown](#)  
**Subject:** Curae Health / BCBST  
**Date:** Saturday, November 2, 2019 5:13:42 PM

---

Steven:

As you will recall, I represent Steven Sass, who is the Liquidating Trustee appointed in the Curae Health bankruptcy case. As a follow-up to our conference call on October 14, we provided the final Form 5500 that was filed for Curae reflecting termination of the Curae Health benefit plan. By this email, I want to make sure that what the Liquidating Trustee is requesting from BCBS is clear. Please provide the following:

- 1) Please perform a trial processing (claims not actually paid) on the claims indicated on the excel spreadsheet labeled: "Curae claims pending 10-10-19", which was provided by Ms. McClurg. As I understand, this will show us the net dollar cost to be paid on these claims. The Trustee's team will review these and get back with any processing instructions.
- 2) On a go forward basis, please send a bi-weekly listing of any new claims received by BCBST for the Curae Health account. Please email this report to: David Lopater, Steven Sass, Lynn Malley, Tim Brown, and myself (all copied on this email).
- 3) Please advise us of how, if at all, BCBST is currently responding to new claims coming in? Is BCBST silent, sending a reject notice to the provider, etc.? If sending a reject letter, please share the language with us.
- 4) Please provide a quote on what BCBST would charge for processing each claim received after 9/27/2019.
- 5) Please remit the full balance of any funds held with respect to Curae Health plan by no later than November 8, 2019. Any additional pharma rebates received by BCBST on the Curae Health plan should be immediately remitted to the Trustee. I will provide bank wiring instructions to you shortly. If there are any unpaid amounts due BCBST or if any of the requests herein are not covered by the existing agreement, please let me know. To the extent that any funds are needed by BCBST to process claims approved by the Trustee going forward, the Trustee will pre-fund those amounts to BCBST.

Thanks for your cooperation and please feel free to contact me if you have any questions or concerns.

Regards,

Mike

Michael E. Collins  
Manier & Herod, P.C.  
1201 Demonbreun Street  
Suite 900  
Nashville, TN 37203

(615) 742-9350  
Fax (615) 242-4203

THIS ELECTRONIC MAIL TRANSMISSION IS PRIVILEGED AND CONFIDENTIAL AND IS INTENDED ONLY FOR THE REVIEW OF THE PARTY TO WHOM IT IS ADDRESSED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE IMMEDIATELY RETURN IT TO THE SENDER. UNINTENDED TRANSMISSION SHALL NOT CONSTITUTE WAIVER OF THE ATTORNEY-CLIENT OR ANY OTHER PRIVILEGE.