

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

---

<b>IN RE:</b>	)	<b>JUDGE WALKER</b>
	)	
<b>CURAE HEALTH, INC., et al.,<sup>1</sup></b>	)	<b>CASE NO. 18-05665</b>
	)	<b>CHAPTER 11</b>
	)	
<b>DEBTORS.</b>	)	<b>JOINTLY ADMINISTERED</b>
	)	

---

**EXPEDITED MOTION FOR ORDER ALLOWING PROPOSED CO-COUNSEL FOR  
OFFICIAL COMMITTEE OF GENERAL UNSECURED CREDITORS TO APPEAR  
TELEPHONICALLY AT HEARING SCHEDULED FOR SEPTEMBER 11, 2018**

---

Comes now, the Official Committee of Unsecured Creditors of Curae Health, Inc., *et al.* (the “Committee”), by and through its counsel, and moves this Court for entry of an order allowing Andrew H. Sherman and Boris I. Mankovetskiy of Sills Cummis & Gross P.C. (“Sills”), proposed co-counsel to the Committee, to appear telephonically at the status conference scheduled for September 11, 2018, at 9:00 a.m. central time (the “Motion”). In support of this Motion, the Committee states as follows:

1. Expedited Relief Requested: By this Motion, the Committee is seeking authority to have Mr. Sherman and Mr. Mankovetskiy appear telephonically at the status conference scheduled for September 11, 2018, at 9:00 a.m. central time, in the above-captioned cases. Mr. Sherman’s and Mr. Mankovetskiy’s offices are located at One Riverfront Plaza Newark, NJ 07102. Due to the scheduled hearing being a status conference and the distance, travel time, and expense required

---

<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).

for Mr. Sherman and Mr. Mankovetskiy to appear in person, the Committee submits that it is appropriate for Mr. Sherman and Mr. Mankovetskiy to appear telephonically. Mr. Sherman and Mr. Mankovetskiy will dial in to the scheduled hearing pursuant to Court's call-in instructions.

2. Basis of Urgency: Sills was retained by the Committee as proposed co-counsel on September 6, 2018, which is within one week of the hearings scheduled on September 11, 2018. As a result, routine notice was impossible.

3. Notice: Notice of this Motion will be sent by operation of the Court's CM/ECF filing system to all parties consenting to electronic service, including (a) proposed counsel for the Debtors; (b) counsel for the United States Trustee; (c) counsel for ServisFirst Bank; and (d) counsel for Midcap Funding IV Trust.

4. No Hearing Required: Given the limited relief requested, the Committee submits that no hearing on this Motion is required.

WHEREFORE, the Committee requests the entry of an order permitting Mr. Sherman and Mr. Mankovetskiy to participate telephonically in the hearings scheduled for September 11, 2018, in the above-captioned cases, and for such other relief as deemed necessary and proper.

Respectfully submitted,

MANIER & HEROD, P.C.

/s/ Michael E. Collins  
Michal E. Collins (Bar No. 16036)  
Robert W. Miller (Bar No. 31918)  
1201 Demonbreun Street, Suite 900  
Nashville, TN 37203  
Telephone: (615)-244-0030  
Facsimile: (615) 242-4203  
mcollins@manierherod.com  
rmiller@manierherod.com

and

SILLS CUMMIS & GROSS P.C.

Andrew H. Sherman (*pro hac vice* to be submitted)  
Boris I. Mankovetskiy  
(*pro hac vice* to be submitted)  
One Riverfront Plaza Newark, NJ 07102  
Telephone: (973) 643-7000  
Facsimile: (973) 643-6500  
asherman@sillscummis.com  
bmankovetskiy@sillscummis.com

*Proposed Co-Counsel for the Official Committee of  
Unsecured Creditors of Curae Health, Inc., et al.*

**CERTIFICATE OF SERVICE**

I hereby certify that on September 10, 2018, a copy of the foregoing was sent via ECF to all parties registered to receive electronic notice in the case.

/s/ Michael E. Collins  
Michael E. Collins