

**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

Re: Docket Nos. 1278, 1284, 1287, 1291

**MOTION TO CONTINUE THE MOTION (I) TO COMPEL
BLUE CROSS BLUE SHIELD OF TENNESSEE, INC. TO (A) TURNOVER
ESTATE PROPERTY AND (B) PROVIDE AN ACCOUNTING OF
ESTATE PROPERTY IN ITS POSSESSION, AND (II) FOR RELATED RELIEF**

Comes now, Steven D. Sass LLC, in its capacity as Liquidating Trustee and Debtor Representative (the “Trustee”), by and through counsel, and respectfully requests this Court to continue the hearing on the *Motion (I) to Compel Blue Cross Blue Shield of Tennessee, Inc. to (A) Turnover Estate Property and (B) Provide an Accounting of Estate Property in its Possession, and (II) for Related Relief* (the “Motion to Compel”) [Doc. No. 1278] scheduled on April 7, 2020. In support of the requested continuance, the Trustee states as follows:

1. The Trustee and Blue Cross Blue Shield of Tennessee, Inc. (“BCBST”) are engaged in negotiations and have exchanged data in an effort to consensually resolve the Motion. Those negotiations remain ongoing and a continuance of the hearing on the Motion is in both parties’ best interests.

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. The Trustee requests that the Court continue the hearing on the Motion to Compel scheduled for April 7, 2020, to April 28, 2020. Counsel for BCBST has consented to the continuance of the Motion.

WHEREFORE, the Trustee requests a continuance of the hearing on the Motion to Compel to April 28, 2020.

Respectfully submitted,

MANIER & HEROD, P.C.

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Co-Counsel to Plaintiff Steven D Sass LLC,
in its capacity as Liquidating Trustee and
Debtor Representative

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2020, a true and exact copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Robert W. Miller _____
Robert W. Miller