

**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
)	
)	Judge Walker
Debtors.)	Jointly Administered

U.S. TRUSTEE’S MOTION REQUESTING A STATUS CONFERENCE

The U.S. Trustee, Region 8, moves this Court for a status conference regarding the progress of the Liquidating Trust in effectuating the confirmed plan of liquidation. In support of this motion, the U.S. Trustee asserts as follows:

1. This Court has jurisdiction to hear and determine this Motion pursuant to 28 U.S.C. § 157(b)(2)(A).
2. Pursuant to 28 U.S.C. § 586(a)(3)(G), the U.S. Trustee is charged with monitoring the progress of cases under the Bankruptcy Code and taking such actions as the U.S. Trustee deems appropriate to prevent undue delay in such progress. The U.S. Trustee has standing to be heard on this request pursuant to 11 U.S.C. § 307.
3. On August 24, 2018, Debtors filed a bankruptcy petition seeking relief under Chapter 11 of the Bankruptcy Code. After much negotiation and several objections, Debtor confirmed a Liquidating Plan on May 13, 2019.
4. The Liquidating Plan created a Liquidating Trust, and Steven D Sass LLC was appointed as the Liquidating Trustee.

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).

5. From the post-confirmation reports, it appears that the Liquidating Trust has not paid administrative or section 503(b)(9) claims. The last report reflects a \$19,085,656 balance in the Liquidating Trust.

6. The U.S. Trustee has received several questions and complaints about the lack of plan payments to administrative and section 503(b)(9) claimants.

7. The U.S. Trustee requests that the Court set a conference to discuss the status of the Liquidating Trust, and what actions are necessary to administratively close this case. Andrew Sherman, counsel for the Liquidating Trust, has confirmed that he is available on June 16th for a status conference if that is convenient for the Court.

WHEREFORE, the U.S. Trustee respectfully requests that the Court enter an Order setting a status conference, and other such other relief as may be appropriate.

Respectfully submitted,

PAUL RANDOLPH,
ACTING US TRUSTEE, REGION 8

/s/ Megan Seliber
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CERTIFICATE OF SERVICE

I certify that on May 20, 2020, a copy of the foregoing document was sent electronically to registered ECF users.

/s/ Megan Seliber
MEGAN SELIBER