

**Exhibit B**

**Sass Declaration**

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

In re:

Curae Health, Inc., *et al.*<sup>1</sup>

1721 Midpark Road, Suite B200  
Knoxville, TN 37921

Debtors.

Chapter 11

Case No. 18-05665

Judge Walker

Jointly Administered

**DECLARATION OF STEVEN D. SASS IN SUPPORT OF MOTION  
FOR ORDER AUTHORIZING ABANDONMENT AND  
DESTRUCTION OF BUSINESS DOCUMENTS**

I, Steven D. Sass, hereby submit this declaration (the “Declaration”) in support of the *Motion For Order Authorizing Abandonment and Destruction of Business Documents* (the “Motion”),<sup>2</sup> filed contemporaneously herewith, and declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am the Sole Member of Steven D Sass, LLC, the Trustee for the Liquidating Trust, which was established pursuant to the Plan in June 2019.
2. Except as otherwise indicated, all statements set forth herein are based upon my personal knowledge gained during my service as Trustee and/or my opinion based upon my experience. If called to testify, I could and would testify to each of the facts set forth herein based upon such knowledge and/or opinion.

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<sup>1</sup> The Debtors in these chapter 11 cases (the “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).

<sup>2</sup> All capitalized terms not defined in this Declaration have the meanings ascribed to them in the Motion.

3. In order to facilitate efficient administration and eliminate unnecessary costs to the Liquidating Trust, I have determined that the Records have no value to the Liquidating Trust and are not necessary for the administration the Liquidating Trust or the wind down the Debtors' estates. Members of my staff have also conferred with the Purchasers and advised me that the Purchasers do not require the Records for any purpose. Because the Records present a burden to the Liquidating Trust to the extent that the Trustee is required to arrange and provide for their retention and storage, I believe that abandoning and securely destroying the Records constitutes a sound exercise of the Trustee's discretion to dispose of Liquidating Trust property.

4. I also anticipate that Additional Records may be identified in the future as having no further utility to the Liquidating Trust. In order to facilitate the administration of the Liquidating Trust, I believe that it will be most efficient for the Court to authorize the Liquidating Trust to abandon and securely destroy any such Additional Records as they are identified without further notice or application to the Court.

5. Based upon the foregoing, I believe that granting the relief requested in the Motion is in the best interest of the Liquidating Trust and the Debtors' estates.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 22, 2020

/s/ Steven D. Sass

Steven D. Sass, as Sole Member of Steven D Sass, LLC in its capacity as Liquidating Trustee and Debtor Representative