

**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

**NOTICE OF REVISED PROPOSED ORDER GRANTING THE TRUSTEE'S
MOTION FOR ENTRY OF AN ORDER AUTHORIZING ABANDONMENT
AND DESTRUCTION OF BUSINESS DOCUMENTS**

Comes now, Steven D Sass LLC, in its capacity as Liquidating Trustee and Debtor Representative (the "Trustee"), by and through counsel, and respectfully submits this *Notice of Revised Proposed Order Granting the Trustee's Motion for Entry of an Order Authorizing Abandonment and Destruction of Business Documents*.

On December 23, 2020, the Trustee filed the *Motion for Order Authorizing Abandonment and Destruction of Business Documents* [Dkt Entry No. 1379] (the "Destruction Motion"). A proposed order was attached to the Destruction Motion as Exhibit A (the "Proposed Destruction Order").

Following the filing of the Destruction Motion, the Trustee received informal comments from certain parties and has, accordingly, revised the Proposed Destruction Order. A clean version of the revised Proposed Destruction Order is attached as **Exhibit A**. A redline reflecting a

¹ 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).

comparison of the original Proposed Destruction Order and the revised Proposed Destruction Order is attached as **Exhibit B**.

Dated: January 27, 2021

Respectfully submitted,

MANIER & HEROD, P.C.

/s/ Robert W. Miller
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
E-Mail: mcollins@manierherod.com
rmiller@manierherod.com

and

SILLS CUMMIS & GROSS P.C.

Andrew H. Sherman (admitted *pro hac vice*)
Boris I. Mankovetskiy (admitted *pro hac vice*)
Daniel J. Harris (*pro hac vice* pending)
One Riverfront Plaza
Newark, NJ 07102
Telephone: (973) 643-7000
Facsimile: (973) 643-6500
E-Mail: asherman@sillscummis.com
bmankovetskiy@sillscummis.com
dharris@sillscummis.com

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

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2021, a copy of the foregoing was sent via ECF to all parties registered to receive electronic notice in the case.

/s/ Robert W. Miller
Robert W. Miller