

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

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

**EXPEDITED MOTION FOR ORDER ALLOWING PROPOSED CO-COUNSEL FOR
OFFICIAL COMMITTEE OF GENERAL UNSECURED CREDITORS TO APPEAR
TELEPHONICALLY AT HEARINGS SCHEDULED FOR SEPTEMBER 18, 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 hearings scheduled for September 18, 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 hearings scheduled for September 18, 2018, at 9:00 a.m. central time, in the above-captioned cases. Mr. Sherman’s office and Mr. Mankovetskiy’s office are both located at One Riverfront Plaza Newark, NJ 07102. The matters scheduled for hearing on September 18, 2018, are a status conference and the Expedited

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).

Motion of Debtors for Entry of an Order Authorizing Assumption of Physician Contracts and Payment of Proposed Cure Amounts (the “Physician Contract Motion”) [Dkt Entry No. 110]. The Committee and the Debtors have come to a consensual resolution regarding the Physician Contract Motion. Due to the scheduled hearings being a status conference and a consensually resolved matter, and the distance, travel time, and expense required 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: The status conference was reset within one week of the hearings scheduled on September 18, 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 18, 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

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*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 13, 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