

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

**In re:**

**Curae Health, Inc., et al.**

**1721 Midpark Road, Suite B200  
Knoxville, TN 37921**

**Debtors.**

**Chapter 11  
Case No. 18-05665**

**Judge Walker**

**Jointly Administered**

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**OBJECTION TO DEBTORS' MOTION FOR ENTRY OF AN  
ORDER (I) AUTHORIZING AND APPROVING BIDDING PROCEDURES FOR THE  
SALE OF GILMORE MEDICAL CENTER, (II) AUTHORIZING THE SALE OF  
GILMORE MEDICAL CENTER FREE AND CLEAR OF ALL LIENS, CLAIMS,  
ENCUMBRANCES AND OTHER INTERESTS, (III) APPROVING STALKING HORSE  
PURCHASER, BREAK-UP FEE, AND OVERBID PROTECTIONS, (IV)  
ESTABLISHING CERTAIN PROCEDURES FOR THE ASSUMPTION AND  
ASSIGNMENT OF EXECUTORY CONTRACTS AND UNEXPIRED LEASES, (V)  
SCHEDULING AN AUCTION, (VI) SCHEDLING A HEARING AND OBJECTION  
DEADLINES WITH REPSECT TO THE SALE OF GILMORE MEDICAL CENTER,  
(VII) APPROVING THE FORM AND MANNER OF NOTICE THEREOF, AND (VIII)  
GRANTING RELATED RELIEF**

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Comes now TCF Equipment Finance and its affiliate Winthrop Resources, and objects to the motion filed by the debtor for entry of an order authorizing and approving bidding procedures for the sale of Gilmore Medical Center and, *inter alia*, establishing certain procedures for the assumption and assignment of executory contracts and unexpired leases, and for cause would show to the court as follows:

1. On August 24, 2018 Amory Regional Medical Center, Inc. commenced a case under Chapter 11 of the Bankruptcy Code.

2. On August 31, 2018, Debtor filed its Motion and Notice to Sell Property Free and Clear of Liens under Section 363(f) proposing to sell Gilmore Medical Center which is owned Debtor Amory Regional Medical Center, Inc. (Doc. #79).

3. Winthrop Resources is the lessor under a certain lease agreement for medical equipment used in the operation of Amory Medical Center. A copy of said Lease Agreement and Assignment of the Lease is attached hereto as Exhibit "A."

4. Debtors' motion fails to provide for the specific assumption and assignment of the leases in Lease Schedule No. 020R and Lease Schedule No. 025 R attached to Exhibit A.

WHEREFORE, Lessor objects to the Motion to Sale.

Respectfully submitted,

HARRIS SHELTON HANOVER WALSH, PLLC

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*Attorneys for Winthrop Resources Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> day of September, 2018 a copy of the foregoing electronically filed Motion and any exhibit attached thereto was served via U.S. mail, postage prepaid or electronic mail upon the United States Trustee, and all parties who have requested to receive notice in this case.

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/s/ John L. Ryder