

**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
)	
1721 Midpark Road, Suite B200)	Judge Walker
Knoxville, TN 37921)	
Debtors.)	Jointly Administered

**WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS' SALE AND BID
PROCEDURES MOTION**

The above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in these jointly administered bankruptcy cases respectfully submit this witness and exhibit list in connection with the hearing (the “**Hearing**”) on *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, (IV) SCHEDULING A HEARING AND OBJECTION DEADLINES WITH RESPECT TO THE SALE OF GILMORE MEDICAL CENTER, (VII) APPROVING THE FORM AND MANNER OF NOTICE THEREOF, AND (VIII) GRANTING RELATED RELIEF* (the “**Motion**”) [Docket No. 79].

A. Witness List

The Debtors identify the following witnesses that may testify in the Hearing.

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).

a. **Stephen Clapp.** Mr. Clapp, on behalf of the Debtors, is expected to testify regarding any and all matters related to the sale of Amory Regional Medical Center (“Amory”) and bid procedures for Amory and any objections thereto by any other parties-in-interest.

b. **Bruce Toppin.** Mr. Toppin, on behalf of North Mississippi Health Services, Inc., is expected to testify regarding any and all matters related to the sale of Amory and bid procedures for Amory and any objections thereto by any other parties-in-interest.

B. Exhibit List

The Debtors do not anticipate offering any exhibits at the Hearing.

Dated: September 21, 2018
Nashville, Tennessee

Respectfully submitted,

POLSINELLI PC

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