

**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

EXPEDITED MOTION FOR HEARING ON DEBTORS' EXPEDITED MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING DEBTORS TO ENTER INTO THE MEMBER SUBSTITUTION AGREEMENT WITH RESPECT TO THE RUSSELLVILLE HOSPITAL AND (II) GRANTING RELATED RELIEF

The above captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in the above-captioned jointly administered chapter 11 cases (these “**Chapter 11 Cases**”), respectfully move the Court (this “**Motion for Hearing**”) for entry of an order (the “**Order**”), in substantially the form filed contemporaneously herewith, setting an expedited hearing on the *Debtors’ Expedited Motion for Entry of an Order (I) authorizing the Debtors to enter into the Member Substitution Agreement with respect to the Russellville Hospital, and (II) granting related relief* filed contemporaneously herewith (the “**Motion**”).² In support of this Motion for Hearing, the Debtors respectfully state as follows:

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).

² Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Motion.

NEED FOR EXPEDITED HEARING PURSUANT TO LOCAL RULE 9075-1

1. Expedited Relief Requested. Local Rule 9075-1 allows the Court to grant emergency orders for expedited motions. Pursuant to Local Rule 9075-1(b), the Debtors request the Court set a hearing on the Motion on an expedited basis.

2. Basis for Urgency. An expedited hearing on the Motion is necessary because the Debtors have urgent need for relief with respect to the Russellville Hospital. Debtor Curae Health has entered into the Member Substitution Agreement, which will allow Russellville Hospital to begin operating separately from these Chapter 11 Cases, relieving the Debtors of the administration required to keep Russellville's operations separate from the operations of the Debtors. Debtors believe that transferring operations of the Russellville Hospital as soon as possible is in the best interests of the Russellville Hospital and the community it serves. Moreover, as set forth more fully in the Motion, entering into the Member Substitution Agreement will also benefit the Debtors' estates. Accordingly, Debtors seek an expedited hearing on the Motion to authorize the Debtors to enter into the Member Substitution Agreement.

3. Notice. Concurrently with the filing of this Motion, the Debtors shall provide notice of this Motion to: (a) the Office of the United States Trustee for the Middle District of Tennessee; (b) Centers for Medicare and Medicaid Services; (c) State of Tennessee Department of Health Division of Licensure and Regulation Office of Health Care Facilities; (d) Mississippi State Department of Health; (e) counsel to the official committee of unsecured creditors established in these cases pursuant to Section 1102 of the Bankruptcy Code; (f) ServisFirst Bank and its counsel; (g) Midcap Financial Trust and its counsel; (h) CHS/Community Health Systems, Inc. and its counsel (i) all Tennessee local counsel having entered a notice of

appearance in these cases; (j) the Internal Revenue Service; (k) the Tennessee Attorney General's Office; (l) the Mississippi Attorney General's Office; (m) the Tennessee Secretary of State; (n) Dava and its counsel; (o) the patient care ombudsman and her proposed counsel; and (p) any party that has requested notice pursuant to Bankruptcy Rule 2002. Service is being executed via the Court's CM/ECF system, email, hand delivery, and/or overnight mail.

4. Suggested Hearing Date. The Debtors request a hearing date on the Motion on **November 27, 2018 at 2:00 p.m.**

5. Support. Debtors support for this Motion for Hearing is set forth in detail in the Motion and the exhibits attached thereto.

WHEREFORE, Debtors request that this Court enter an order setting a hearing on the Motion for **November 27, 2018 at 2:00 p.m.** and granting such other and further relief as this Court may deem just and proper.

Dated: November 15, 2018
Nashville, Tennessee

Respectfully submitted,

POLSINELLI PC

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