

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

<b>In re:</b>	)	<b>Chapter 11</b>
	)	<b>Case No. 18-05665</b>
<b>Curae Health, Inc., et al.<sup>1</sup></b>	)	
	)	
<b>1721 Midpark Road, Suite B200</b>	)	<b>Judge Walker</b>
<b>Knoxville, TN 37921</b>	)	
	)	<b>Jointly Administered</b>
<b>Debtors.</b>	)	

**LIMITED OBJECTION OF PROGRESSIVE MEDICAL MANAGEMENT OF  
BATESVILLE, LLC RELATING TO THE SALE OF THE PROPOSED PURCHASED  
ASSETS OF PANOLA MEDICAL CENTER**

COMES NOW Progressive Medical Management of Batesville, LLC (“Progressive Medical Management”) and files its Limited Objection Relating to the Sale of the Proposed Purchased Assets of Panola Medical Center and would show unto this Court as follows:

1. Progressive Medical Management is the Stalking Horse Purchaser of the Proposed Purchases Assets of Panola Medical Center.

2. Pursuant to the *Order (I) Authorizing and Approving Bidding Procedures for the Sale of Panola Medical Center, (II) Authorizing the Sale of Panola 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 Procedures for the Assumption and Assignment of Executory Contracts and Unexpired Leases, (V) Scheduling an Auction, (VI) Scheduling a Hearing and Objection Deadlines with Respect to the Sale of Panola Medical Center, (VII) Approving the Form and Manner of Notice Thereof, and (VIII) Granting*

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<sup>1</sup> 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).

*Related Relief* [Dkt # 507], the deadline for submitting objections to the proposed sale is January 2, 2019 at 5:00 p.m.

3. Progressive Medical Management is in the process of working through a number of issues relating to the sale and closing, including, but not limited to, potential revisions to the Panola APA, and files this limited objection out of an abundance of caution in order to preserve its right to bring any unresolved issues before the Court at the Sale Hearing on January 11, 2019.

This the 2nd day of January, 2019.

Respectfully submitted,

/s/ Sean C. Kirk  
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*Counsel for Progressive Medical Management of  
Batesville, LLC*

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel who have appeared in this action, to the Office of the U.S. Trustee, AND to all registered participants including the following:

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This 2<sup>nd</sup> day of January 2019.

/s/ Sean C. Kirk  
Sean C. Kirk