

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

In re:)	
)	Case No. 18-05665
Curae Health, Inc., <i>et.al</i> ¹ ,)	Chapter 11
)	
1721 Midpark Road, Suite B200)	Judge Walker
Knoxville, TN 37921)	Jointly Administered
)	
Debtors.)	Hearing Date: February 21, 2019 at 9:00 a.m., CT

**TALLAHATCHIE VALLEY ELECTRIC POWER ASSOCIATION’S
WITNESS LIST AND EXHIBIT LIST FOR HEARINGS
SCHEDULED FOR FEBRUARY 21, 2019**

Tallahatchie Valley Electric Power Association (“Tallahatchie Valley”), by and through its undersigned counsel, hereby file its witness list and exhibit list in connection with the hearings scheduled for February 21, 2019, at 9:00 a.m., Central Time, regarding (a) the Debtor’s motion for authority to sell certain assets affiliated with the Panola Medical Center in Batesville, Mississippi (Docket No. 401) (the “Sale Motion”), (b) the Debtors’ notice of intent to assume and assign certain executory contracts to the approved purchaser of said assets (Docket No. 513), (c) the Stalking Horse Purchaser’s notice of intent to assume executory contracts and unexpired leases (Docket No. 549), and (d) several objections (including Tallahatchie Valley’s objection to the sale motion (at Docket No. 601)) to the Sale Motion and to the cure amounts related to the Sale Motion and the proposed sale of assets affiliated with the Panola Medical Center.

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); Clarksdale Regional Center, Inc. (4755); Amory Regional Physicians, LLC (5044); Batesville Regional Physicians, LLC (4952); and Clarksdale Regional Physicians, LLC (5311).

763186.1/020181297

WITNESS LIST

Tallahatchie Valley identifies the following individuals whom it may call as witnesses at the hearings:

1. Earl Gibson, Director of Member Services, Tallahatchie Valley; and
2. Any other individual designated by any other party to these contested matters.

EXHIBIT LIST

Tallahatchie Valley identifies the following documents it may introduce into evidence at the hearings:

1. Industrial Power Contract, dated February 21, 2001, with Tri-Lakes Medical Center;
2. The Application for Membership related to No. 1 above;
3. Industrial Power Contract, dated January 26, 1977, with South Panola Community Hospital;
4. Industrial Power Contract, dated November 25, 2013, with Tri-Lakes Medical Center;
5. General Power Rate Schedule General Services Agreement;
6. Schedule of unpaid pre-petition charges for three largest accounts, including a summary page plus detailed sub-schedule for each account;
7. Supporting invoices for the accounts;
8. Tallahatchie Valley rules/regulations;
9. Curae Health's Schedule of General Unsecured Claims, page 122 (Docket No. 12), referencing Tallahatchie Valley's claim for \$123,083.15, for "Utility" service;
10. Adequate Assurance Agreement between Tallahatchie Valley and Curae Health, dated November 12, 2018;

11. Examples of two (2) Tallahatchie Valley post-petition invoices; and
12. Any other exhibits designated by any other party to these contested matters.

Tallahatchie Valley is filing the documents identified in paragraphs 1 through 11 above electronically, and parties desiring copies of them may access the documents through the Court's electronic filing system. In addition, parties desiring copies of the exhibits may contact the undersigned counsel for Tallahatchie Valley.

This the 15th day of February, 2019.

/s/ Thomas H. Forrester

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*Attorneys for Tallahatchie Valley
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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2019, a true and correct copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Thomas H. Forrester

Thomas H. Forrester