

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

In re:)
) Chapter 11
CURAE HEALTH, INC., et al.¹) Case No. 18-05665
) Judge Walker
Debtors.) Jointly Administered
)

Hearing Date: February 28, 2019 at 9:00 a.m., CT

THE STATE OF MISSISSIPPI DIVISION OF MEDICAID’S
OBJECTION TO DISCLOSURE STATEMENT ACCOMPANYING DEBTOR’S
CHAPTER 11 PLAN OF LIQUIDATION

The State of Mississippi, Mississippi Division of Medicaid (“MSDOM”) respectfully submits this objection to the DISCLOSURE STATEMENT FOR DEBTORS’ CHAPTER 11 PLAN OF LIQUIDATION, filed January 22, 2019, by the Debtors herein (the “Disclosure Statement”) (Docket No. 699), accompanying the DEBTORS’ CHAPTER 11 PLAN OF LIQUIDATION (the “Debtors’ Plan”) (Docket No. 698), also filed on January 22, 2019. In support of this objection, MSDOM respectfully states 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). This Motion does not concern and is not directed at Amory Regional Physicians, LLC (5044); Batesville Regional Physicians, LLC (4952); Clarksdale Regional Physicians, LLC (5311).

1. MSDOM holds substantial claims for administrative expenses incurred by the Hospital Debtors prior to and after the filing of a petition.

2. MSDOM has moved to (I) Approve its Administrative Expense, and Compel Payment Thereof, and (II) Upon Any Failure to Pay that the Debtor(s) Be Required to Appear at a Hearing to Show Cause and for the Court to Hear and Consider Whether to Dismiss or Convert the Proceedings [Docket No. 758].

3. MSDOM incorporates and reasserts those matters set forth the said motion as a basis to deny approval of the Disclosure Statement.

4. MSDOM joins in the objection to the Disclosure Statement of the United States Trustee. (the “UST Objection”) (Docket No 715).

Accordingly, MSDOM respectfully objects to the approval of the Disclosure Statement, and suggests that the Debtors’ motion for approval of the Disclosure Statement be denied in all respects.

Dated: February 21, 2019.

Respectfully submitted,

THE STATE OF MISSISSIPPI,
MISSISSIPPI DIVISION OF MEDICAID

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CERTIFICATE OF SERVICE

I hereby certify that on February 21, 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/ James A. Bobo
JAMES A. BOBO

