

**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: (I) APPROVAL OF DEBTORS’
DISCLOSURE STATEMENT AND PROCEDURES MOTION AND (II) THE
ADJOURNED OBJECTION OF CHCT MISSISSIPPI, LLC**

The above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in these jointly administered bankruptcy cases respectfully submit this amended witness and exhibit list in connection with the hearing set for February 28, 2019 (the “**Hearing**”) on (I) *Debtors’ Disclosure Statement in Support of Debtors’ Chapter 11 Plan of Liquidation* (the “**Disclosure Statement**”) [Docket No. 699] filed in support of *Debtors’ Chapter 11 Plan of Liquidation* (the “**Plan**”) [Docket No. 698] and *Debtors’ Motion for an Order (I) Approving Disclosure Statement; (II) Establishing Forms and Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Plan; (III) Establishing Deadline and Procedures for Filing Objections to the Confirmation of the Plan; and (IV) Granting Related Relief* [Docket No. 700] (the “**Procedures Motion**”) and (II) the adjourned Objection of CHCT Mississippi, LLC (the “**Adjourned CHCT Objection**”) [Docket No. 539] to *Debtors’ Notice of: (I) Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and*

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).

Unexpired Leases of Nonresidential Real Property; and (II) Cure Amounts to the Foregoing
[Docket No. 513].

A. Witness List

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

a. **Stephen Clapp.** Mr. Clapp, on behalf of the Debtors, is expected to testify regarding any and all matters related to the Disclosure Statement, the Procedures Motion, and the Adjourned CHCT Objection.

b. **William McCaleb.** Mr. McCaleb, on behalf of the Debtors, is expected to testify regarding any and all financial matters related to the Disclosure Statement, the Procedures Motion, and the Adjourned CHCT Objection.

B. Exhibit List

1. Debtors' Plan with proposed revisions.
2. Redline of Debtors' Plan reflecting all proposed revisions.
3. Debtors' Disclosure Statement with proposed revisions.
4. Redline of Debtors' Disclosure Statement reflecting all proposed revisions.
5. Certified Charter of Curae Health, Inc.
6. Certified Charter of Amory Regional Medical Center, Inc.
7. Certified Charter of Batesville Regional Medical Center, Inc.
8. Certified Charter of Clarksdale Regional Medical Center, Inc.
9. By-laws of Curae Health, Inc.
10. By-laws of Amory Regional Medical Center, Inc.

11. By-laws of Batesville Regional Medical Center, Inc.
12. By-laws of Clarksdale Regional Medical Center, Inc.
13. Board minutes of Curae Health, Inc. – November 2014.
14. Board minutes of Curae Health, Inc. – January 2015.
15. Board minutes of Curae Health, Inc. – August 2015.
16. Board minutes of Curae Health, Inc. – May 2016.
17. Board minutes of Curae Health, Inc. – April 2017.
18. Board minutes of Curae Health, Inc. – October 2017.
19. Board minutes of Curae Health, Inc. – March 2018.
20. Board minutes of Curae Health, Inc. – April 2018.
21. VMG Health Appraisal of Gilmore Medical Center.
22. CBRE Appraisal of Gilmore Medical Center Property.
23. VMG Health Appraisal of Panola Medical Center.
24. CBRE Health Appraisal of Panola Medical Center Property.
25. VMG Health Appraisal of Northwest Mississippi Medical Center.
26. CBRE Appraisal of Northwest Mississippi Medical Center Property.
27. LBMC Financial Due Diligence Report.
28. PYA Fair Market Value Compensation in Connection with Management Services Agreement between Curae Health, Inc. and Strategic Healthcare Resources, LLC.
29. Lewis Health Advisors Valuation of Management Agreement.

30. Any exhibits listed on any other parties' exhibit list.

Debtors reserve the right to upload amended exhibits to reflect any additional proposed revisions to the Plan and Disclosure Statement to resolve objections to the Debtors' Disclosure Statement.

Dated: February 25, 2019
Nashville, Tennessee

Respectfully submitted,

POLSINELLI PC

/s/ Michael Malone

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-and-

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