

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

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

**CHCT MISSISSIPPI, LLC’S AMENDED AND SUPPLEMENTAL WITNESS AND
EXHIBIT LIST FOR HEARINGS SCHEDULED FOR FEBRUARY 28, 2019**

CHCT Mississippi, LLC (“CHCT”), by and through its undersigned counsel, hereby submits its amended and supplemental witness and exhibit list in connection with the hearings scheduled for February 28, 2019, at 9:00 a.m., Central Time, upon the following:

(a) the *Debtors’ Motion for Entry of an 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, (II) Establishing Certain 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 Related Relief* (Docket No. 401);

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).

(b) the *Notice of (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property; and (II) Cure Amounts Related to the Foregoing* (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 CHCT's *Limited Objection to Notice of: (I) Debtors' Intent to Assume and Assign Certain Executory Contracts, Unexpired Leases of Personal Property, and Unexpired Leases of Nonresidential Real Property; and (II) Cure Amounts Related to the Foregoing* (Docket No. 539)).

WITNESS LIST

CHCT identifies the following individual whom it may call as a witness in the hearings:

1. W. Page Barnes, EVP & CFO, Community Healthcare Trust, Inc., 3326 Aspen Grove Drive, Suite 150, Franklin, TN 37067, (615) 771-3052

In addition, CHCT may call any other individual designated by any other party to these contested matters.

EXHIBIT LIST

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

1. Master Lease Agreement dated May 1, 2017 with Batesville Regional Medical Center, Inc. for 205 Medical Center Drive, Batesville, Mississippi;

2. Guaranty of Obligations Pursuant to Master Lease Agreement, executed by Debtor Curae Health, Inc., dated May 1, 2017, as to 205 Medical Center Drive, Batesville, Mississippi;

3. Master Lease Agreement dated November 1, 2017 with Batesville Regional Medical Center, Inc. for 155 Keating Road, Batesville, Mississippi;

4. Guaranty of Obligations Pursuant to Master Lease Agreement, executed by Debtor Curae Health, Inc., dated November 1, 2017, as to 155 Keating Road, Batesville, Mississippi;

5. Summary of Amounts Owed to CHCT as attached to Proof of Claim filed by CHCT on January 18, 2019 (Claim No. 234 in Case 3:18-bk-05665; Claim No. 40 in Case 3:18-bk-05676);

6. 2017 Property Inspection and valuation of Curae Batesville-Tri Lakes Behavioral Hospital as of 4/20/2017 (completed as of time of purchase);

7. Photos of roof leaks at Batesville facility at 155 Keating Road, Batesville, Mississippi;

8. Other summaries of invoices and account ledgers detailing outstanding and unpaid charges (and cure amounts) under each of the above agreements if needed; and

9. Any other exhibits designated by any other party to these contested matters.

CHCT is submitting the documents identified in paragraphs 1 through 7 above electronically through the Court's Electronic Evidence Submission Application pursuant to the Electronic Evidence Procedures, 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 CHCT.

This the 26th day of February, 2019.

Respectfully Submitted,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

/s/ Erno Lindner

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Counsel to CHCT of Mississippi, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 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/ Erno Lindner _____