

**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., <i>et al.</i> ¹)	
1721 Midpark Road, Suite B200)	Judge Walker
Knoxville, TN 37921)	
)	Jointly Administered
Debtors.)	

**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: March 19, 2019
IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: March 26, 2019, at
9:00 a.m. Central Standard Time in Courtroom 2, 2nd Floor, Customs House, 701
Broadway, Nashville, Tennessee 37203**

**NOTICE OF FIRST INTERIM FEE APPLICATION
OF GREENBERG TRAURIG, LLP**

PLEASE TAKE NOTICE that on February 26, 2019, Greenberg Traurig, LLP filed the *FIRST INTERIM FEE APPLICATION OF GREENBERG TRAURIG, LLP FOR COMPENSATION AND REIMBURSEMENT OF FEES AND EXPENSES AS COUNSEL TO THE PATIENT CARE OMBUDSMAN FOR THE PERIOD FROM SEPTEMBER 18, 2018 THROUGH JANUARY 31, 2019* (the “**First Interim Application**”), attached hereto.

PLEASE TAKE FURTHER NOTICE that if a response is timely filed, a hearing on the First Interim Application will be held on **March 26, 2019, at 9:00 a.m. Central Standard Time** in Courtroom 2, 2nd Floor Customs House, 701 Broadway, Nashville, TN 37203.

YOUR RIGHTS MAY BE AFFECTED. If you do not want the court to grant the First Interim Application by entering the proposed final order, attached hereto, or if you want the court to consider your views on the First Interim Application, then on or before **March 19, 2019**, you or your attorney must:

1. File with the court your response or objection explaining your position. **Please note: the Bankruptcy Court for the Middle District of Tennessee requires electronic filing. Any**

CHI 69891490v2

response or objection you wish to file must be submitted electronically. To file electronically, you or your attorney must go to the court website and follow the instructions at: <https://ecf.tnmb.uscourts.gov>.

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: 701 Broadway, 1st Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state the deadline for filing responses, the date of the scheduled hearing and the application to which you are responding.

THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE. If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. You may check whether a timely response has been filed by viewing the case on the court's website at <https://ecf.tnmb.uscourts.gov>. If you or your attorney does not take these steps, the court may decide that you do not oppose the relief sought in the First Interim Application and may enter the attached final order granting that relief.

[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]

Dated: February 26, 2019

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod

Terminus 200

3333 Piedmont Road, NE, Suite 2500

Atlanta, GA 30305

Telephone: (678) 553-2259

Facsimile: (678) 553.2212

Email: elrodj@gtlaw.com

-and-

Nancy Peterman

77 West Wacker Drive, Suite 3100

Chicago, IL 60601

Telephone: (312) 456-8400

Facsimile: (312) 456-8435

Email: petermann@gtlaw.com

Counsel for the Patient Care Ombudsman

**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., <i>et al.</i> ¹)	
1721 Midpark Road, Suite B200)	Judge Walker Jointly Administered
Knoxville, TN 37921)	
)	
Debtors.)	

**FIRST INTERIM FEE APPLICATION OF GREENBERG TRAURIG, LLP FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO
THE PATIENT CARE OMBUDSMAN FOR THE PERIOD FROM
SEPTEMBER 18, 2018 THROUGH JANUARY 31, 2019**

Greenberg Traurig, LLP (“GT”), as counsel to Suzanne Koenig, Patient Care Ombudsman (the “**Ombudsman**”), hereby submits its first interim fee application (the “**First Interim Application**”) and seeks entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), pursuant to 11 U.S.C. §§ 330 and 331, granting approval of its interim compensation and reimbursement of expenses for the period from September 18, 2018 through January 31, 2019 (the “**Compensation Period**”). In support thereof, GT respectfully represents as follows:

GENERAL BACKGROUND

1. On August 24, 2018 (the “**Petition Date**”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with this Court commencing the above- captioned chapter 11 cases (the “**Chapter 11 Cases**”). The factual background regarding the Debtors, including their business operations, debt structure, and the events leading to the filing of the Chapter 11 Cases is set forth in detail in the *Declaration of Stephen N. Clapp, Chief Executive*

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

Officer of Curae Health, Inc., in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 49].

2. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code.

3. On August 29, 2018, the Court entered an order authorizing the joint administration of the Chapter 11 Cases [Docket No. 59].

4. On September 18, 2018, the Office of the United States Trustee appointed the Ombudsman [Docket No. 191].

5. On November 1, 2018, the Court entered an *Order Authorizing the Retention and Employment of Greenberg Traurig, LLP, as Counsel, Nunc Pro Tunc as of September 18, 2018* [Docket No. 388].

6. This is the first interim application for fees and expenses incurred by GT as counsel to the Patient Care Ombudsman in the Chapter 11 Cases.

PROJECT CATEGORIES

7. Attached hereto as **Exhibit B** is a detailed statement of legal services rendered in the aggregate amount of \$15,714.50 and expenses incurred in the amount of \$545.63 during the Compensation Period. The services have been put in the following categories:

Project Category	Estimated Hours	Estimated Fees
Asset Analysis	0.4	\$260.00
Case Administration	0.7	\$455.00
Fee/Employment Applications	1.1	\$715.00
Preparation and Review of Reports	2.0	\$1,150.00
Creditor Inquiries	0.8	\$520.00
Court Hearings	6.3	\$4,095.00
Sale of Property	3.8	\$1,889.50
Total		\$15,714.50

STATEMENT OF APPLICANT

8. The services were actual and necessary services rendered by GT as counsel to the Ombudsman and the compensation requested is reasonable. Although this First Interim Application is not governed by the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013* (the “**UST Guidelines**”) because the Debtors do not have assets in excess of \$50 million, GT prepared the attached exhibits in the interest of transparency: Summary Cover Sheet as **Exhibit C**; Summary of Timekeepers as **Exhibit D**. These Exhibits provide a summary of the fee application and the rates being charged by GT in this First Interim Application.

9. In accordance with the foregoing, GT states as follows:
- A. GT’s hourly rates have been discounted from GT’s standard rates. In particular, GT has voluntarily agreed to discount the hourly rate for Nancy Peterman to \$650 per hour.
 - B. No professionals from GT covered by this First Interim Application have varied their hourly rates based upon the geographical location of the Chapter 11 cases.
 - C. The fees covered by this First Interim Application include approximately 0.0 hours reviewing invoices to ensure that the time entries attached to this First Interim Application are properly coded to comply with the UST Guidelines.
 - D. The fees covered by this First Interim Application include approximately 0.0 hours in reviewing time records to redact any privileged or other confidential information.
 - E. GT rate changes effective January 1, 2019 affected certain GT timekeepers. However, those rates are not the subject of this First Interim Application.

EXPENSES

10. This First Interim Application includes a request for reimbursement of expenses in the amount of \$545.63 which are expenses incurred by GT, further described below. All expenses

were actual and necessary expenses incurred in providing the legal services described herein and are reimbursable pursuant to 11 U.S.C. § 330.

Category	Amount (\$)
Local travel (taxis/parking)	380.40
Local travel (lodging/airfare)	95.23
Other (Telephonic Appearance Fee)	70.00
Total Expenses	\$545.63

WHEREFORE, pursuant to 11 U.S.C. § 330, GT seeks allowance and payment of the fees and expenses incurred by GT during these Chapter 11 Cases for the Compensation Period as provided in this First Interim Application. GT respectfully requests that the Court enter the Proposed Order (i) approving the First Interim Application, (ii) authorizing and directing the Debtors to pay to GT \$15,714.50 as compensation for necessary professional services rendered, (iii) authorizing and directing the Debtors to pay to GT \$545.63 as reimbursement of actual necessary costs and expenses, and (iv) granting such further relief as is just and proper.

Dated: February 26, 2019

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod
Terminus 200
3333 Piedmont Road, NE, Suite 2500
Atlanta, GA 30305
Telephone: (678) 553-2259
Facsimile: (678) 553.2212
Email: elrodj@gtlaw.com

-and-

Nancy Peterman
77 West Wacker Drive, Suite 3100
Chicago, IL 60601
Telephone: (312) 456-8400
Facsimile: (312) 456-8435
Email: petermann@gtlaw.com

Counsel for the Patient Care Ombudsman

CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2019, a copy of the foregoing was sent via ECF to all parties registered to receive electronic notice in the case and via U.S. mail, postage prepaid, to the parties listed on the mailing matrix attached as **Exhibit E**.

/s/ John D. Elrod

John D. Elrod

EXHIBIT A

Proposed Order

**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., <i>et al.</i> ¹)	
1721 Midpark Road, Suite B200)	Judge Walker Jointly Administered
Knoxville, TN 37921)	
)	
Debtors.)	

**PROPOSED ORDER GRANTING FIRST INTERIM FEE
APPLICATION OF GREENBERG TRAUIG, LLP AS
COUNSEL TO THE PATIENT CARE OMBUDSMAN**

Upon consideration of the First Interim Application of Greenberg Traurig, LLP as counsel to Suzanne Koenig, as Patient Care Ombudsman (the “**Ombudsman**”), for allowance of compensation and reimbursement of expenses, on an interim basis, for the Compensation Period; and it appearing to the Court that all of the requirements of sections 327, 328, 330, 331 and 503(b) of title 11 of the United States Code, as well as Rule 2016 of the Federal Rules of Bankruptcy Procedure and Rules 2016-1 and 9013-1 of the Local Rules for the United States Bankruptcy Court for the Middle District of Tennessee, have been satisfied; and it further appearing that the expenses incurred were reasonable and necessary; and that notices of the First Interim Application was appropriate; and after due deliberation and sufficient good cause appearing; and that there were no objections to the First Interim Application, it is hereby

ORDERED, ADJUDGED, AND DECREED:

1. The First Interim Application of GT is approved on an interim basis.
2. The fees in the amount of \$15,714.50 and expenses in the amount of \$545.63 incurred by GT during the Compensation Period are hereby allowed as being reasonable compensation and actual, necessary services and expenses of the estates and thus payable as fees and expenses pursuant to 11 U.S.C. § 330.

3. The Debtors are authorized and directed to remit, or cause to be remitted, payment in the amounts \$16,260.13.

4. The Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

This Order Was Signed and Entered Electronically as Indicated at the Top of the First Page

GREENBERG TRAURIG, LLP

/s/ John D. Elrod

John D. Elrod

Terminus 200

3333 Piedmont Road, NE, Suite 2500

Atlanta, GA 30305

Telephone: (678) 553-2259

Facsimile: (678) 553.2212

Email: elrodj@gtlaw.com

-and-

Nancy Peterman

77 West Wacker Drive, Suite 3100

Chicago, IL 60601

Telephone: (312) 456-8400

Facsimile: (312) 456-8435

Email: petermann@gtlaw.com

Counsel for the Patient Care Ombudsman

EXHIBIT B

Detailed Statement of Legal Services

Invoice No. : 4952346
File No. : 102171.013500
Bill Date : December 20, 2018

Suzanne Koenig, as Patient Care Ombudsman
SAK Management Services, LLC
300 Saunders Rd.
Suite 300
Riverwoods, IL 60015

Attn: Suzanne Koenig

INVOICE

Re: Curae Health, Inc.

Legal Services through October 31, 2018:

Total Fees: \$ 10,250.00

Expenses:

Local Travel 57.84
Travel and Lodging Out of Town 417.79

Total Expenses: \$ 475.63

Current Invoice: \$ 10,725.63

NAP:MK

Tax ID: 13-3613083

Invoice No. : 4952346
File No. : 102171.013500

***FOR YOUR CONVENIENCE,
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT
FOR FEES & COSTS ARE AS FOLLOWS:***

PLEASE RETURN WITH YOUR PAYMENT

CLIENT NAME: SUZANNE KOENIG, AS PATIENT CARE OMBUDSMAN
FILE NUMBER:

INVOICE NUMBER: 4952346*

BILLING

PROFESSIONAL: Nancy A. Peterman

Current Invoice: \$ 10,725.63

Total Amount Due: \$ 10,725.63

For Wire and ACH Instructions:

TO: CITIBANK, N.A.
ABA #: 266086554
CREDIT TO: GREENBERG TRAURIG ACCOUNT
ACCOUNT #: 3200175071

PLEASE

REFERENCE: **CLIENT NAME:** **SUZANNE KOENIG, AS PATIENT CARE
OMBUDSMAN**
 FILE NUMBER: **102171.013500**
 INVOICE NUMBER: **4952346***
 BILLING
 PROFESSIONAL: **Nancy A. Peterman**

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

NAP:MK

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: 801 ASSET ANALYSIS AND RECOVERY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/02/18	Nancy A. Peterman	Determine case issues that PCO must review.	0.40	260.00
			<hr/>	
			Total Hours:	0.40
			Total Amount:	\$ 260.00

TIMEKEEPER SUMMARY FOR TASK CODE 801,

ASSET ANALYSIS AND RECOVERY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Nancy A. Peterman	0.40	650.00	260.00
Totals:	0.40	650.00	\$ 260.00

Invoice No.: 4952346
Matter No.: 102171.013500

Page 2

Description of Professional Services Rendered

TASK CODE: 804 CASE ADMINISTRATION

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/16/18	Nancy A. Peterman	Review and analysis of closure motion (Clarksdale).	0.30	195.00
10/17/18	Nancy A. Peterman	Review background materials on case in preparation for report.	0.40	260.00
			Total Hours:	0.70
			Total Amount:	\$ 455.00

TIMEKEEPER SUMMARY FOR TASK CODE 804,

CASE ADMINISTRATION

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Nancy A. Peterman	0.70	650.00	455.00
Totals:	0.70	650.00	\$ 455.00

Invoice No.: 4952346
Matter No.: 102171.013500

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Description of Professional Services Rendered

TASK CODE: 809 FINANCING MATTERS & CASH COLL

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/09/18	John D. Elrod	Review of draft DIP financing objection.	0.20	130.00
10/09/18	Nancy A. Peterman	Draft objection to DIP financing order.	1.00	650.00
10/15/18	John D. Elrod	Prepared for hearing on DIP financing motion (5.2); conference call with client regarding same (.6); negotiations with DIP lender's counsel (.4).	6.20	4,030.00
			<hr/>	
			Total Hours:	7.40
			Total Amount:	\$ 4,810.00

TIMEKEEPER SUMMARY FOR TASK CODE 809,

FINANCING MATTERS & CASH COLL

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	6.40	650.00	4,160.00
Nancy A. Peterman	1.00	650.00	650.00
Totals:	7.40	650.00	\$ 4,810.00

Invoice No.: 4952346
Matter No.: 102171.013500

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Description of Professional Services Rendered

TASK CODE: 813 FEE/EMPLOYMENT APPLICATIONS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/18	John D. Elrod	Revised notice of appearance	0.30	195.00
10/02/18	Nancy A. Peterman	Review and comment on draft retention papers for GT (.30) and SAK (.30).	0.60	390.00
10/30/18	John D. Elrod	Review submission of proposed orders on SAK and GT retention applications.	0.20	130.00
			<hr/>	
			Total Hours:	1.10
			Total Amount:	\$ 715.00

TIMEKEEPER SUMMARY FOR TASK CODE 813,

FEE/EMPLOYMENT APPLICATIONS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	0.50	650.00	325.00
Nancy A. Peterman	0.60	650.00	390.00
Totals:	1.10	650.00	\$ 715.00

Invoice No.: 4952346
Matter No.: 102171.013500

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Description of Professional Services Rendered

TASK CODE: 824 PREPARATION/REVIEW REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/29/18	Carla Greenberg	Draft notice of ombudsmans first report and affidavit of posting (.2); email same to N. Peterman, J. Elrod and S. Koenig (.1).	0.30	45.00
			Total Hours:	0.30
			Total Amount:	\$ 45.00

TIMEKEEPER SUMMARY FOR TASK CODE 824,

PREPARATION/REVIEW REPORTS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Carla Greenberg	0.30	150.00	45.00
Totals:	0.30	150.00	\$ 45.00

Invoice No.: 4952346
Matter No.: 102171.013500

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Description of Professional Services Rendered

TASK CODE: 832 CREDITOR INQUIRIES

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/16/18	Nancy A. Peterman	Review and analysis of APA (Armory).	0.40	260.00
10/17/18	Nancy A. Peterman	Review sale motion.	0.40	260.00
			Total Hours:	0.80
			Total Amount:	\$ 520.00

TIMEKEEPER SUMMARY FOR TASK CODE 832,

CREDITOR INQUIRIES

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Nancy A. Peterman	0.80	650.00	520.00
Totals:	0.80	650.00	\$ 520.00

Invoice No.: 4952346
Matter No.: 102171.013500

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Description of Professional Services Rendered

TASK CODE: 833 COURT HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/16/18	John D. Elrod	Prepare for (2.0) and attend (3.3) hearing on DIP financing.	5.30	3,445.00
			<hr/>	
			Total Hours:	5.30
			Total Amount:	\$ 3,445.00

TIMEKEEPER SUMMARY FOR TASK CODE 833,

COURT HEARINGS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	5.30	650.00	3,445.00
Totals:	5.30	650.00	\$ 3,445.00

Invoice No.: 4952346
Matter No.: 102171.013500

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Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	12.20	650.00	7,930.00
Nancy A. Peterman	3.50	650.00	2,275.00
Carla Greenberg	0.30	150.00	45.00
Totals:	16.00	640.63	\$ 10,250.00

Invoice No.: 4952346
Re: Curae Health, Inc.
Matter No.: 102171.013500

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
10/15/18	VENDOR: Elrod, John D. INVOICE#: 2829634310181303 DATE: 10/18/2018 Airfare; 10/15/18 - Attorney airfare for travel to and from Nashville, TN for court hearing	\$ 380.40
10/16/18	VENDOR: Elrod, John D. INVOICE#: 2829634310181303 DATE: 10/18/2018 Car Service/Taxi; 10/16/18 - Attorney transportation to airport	\$ 25.78
10/16/18	VENDOR: Elrod, John D. INVOICE#: 2829634310181303 DATE: 10/18/2018 Car Service/Taxi; 10/16/18 - Attorney return transportation from airport	\$ 32.06
10/16/18	VENDOR: Elrod, John D. INVOICE#: 2829634310181303 DATE: 10/18/2018 Car Service/Taxi; 10/16/18 - Attorney transportation from Nashville airport to courthouse	\$ 18.81
10/16/18	VENDOR: Elrod, John D. INVOICE#: 2829634310181303 DATE: 10/18/2018 Car Service/Taxi; 10/16/18 - Attorney transportation from courthouse to Nashville airport	\$ 18.58
Total Expenses:		<hr/> \$ 475.63

Invoice No. : 4952347
File No. : 102171.013500
Bill Date : December 11, 2018

Suzanne Koenig, as Patient Care Ombudsman
SAK Management Services, LLC
300 Saunders Rd.
Suite 300
Riverwoods, IL 60015

Attn: Suzanne Koenig

INVOICE

Re: Curae Health, Inc.

Legal Services through November 30, 2018:

Total Fees: \$ 2,470.00

Expenses:

Court Fees

70.00

Total Expenses: \$ 70.00

Current Invoice: \$ 2,540.00

NAP:MK

Tax ID: 13-3613083

Invoice No. : 4952347
File No. : 102171.013500

***FOR YOUR CONVENIENCE,
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT
FOR FEES & COSTS ARE AS FOLLOWS:***

PLEASE RETURN WITH YOUR PAYMENT

CLIENT NAME: SUZANNE KOENIG, AS PATIENT CARE OMBUDSMAN
FILE NUMBER:

INVOICE NUMBER: 4952347*

BILLING
PROFESSIONAL: Nancy A. Peterman

Current Invoice: \$ 2,540.00

Total Amount Due: \$ 2,540.00

For Wire and ACH Instructions:

TO: CITIBANK, N.A.
ABA #: 266086554
CREDIT TO: GREENBERG TRAURIG ACCOUNT
ACCOUNT #: 3200175071

PLEASE

REFERENCE: **CLIENT NAME:** **SUZANNE KOENIG, AS PATIENT CARE
OMBUDSMAN**
FILE NUMBER: **102171.013500**
INVOICE NUMBER: **4952347***
BILLING
PROFESSIONAL: **Nancy A. Peterman**

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

NAP:MK

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: 824 PREPARATION/REVIEW REPORTS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/16/18	Nancy A. Peterman	Review and comment on Ombudsman's first report.	2.80	1,820.00
			<hr/>	
			Total Hours:	2.80
			Total Amount:	\$ 1,820.00

TIMEKEEPER SUMMARY FOR TASK CODE 824,

PREPARATION/REVIEW REPORTS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Nancy A. Peterman	2.80	650.00	1,820.00
Totals:	2.80	650.00	\$ 1,820.00

Invoice No.: 4952347
Matter No.: 102171.013500

Page 2

Description of Professional Services Rendered

TASK CODE: 833 COURT HEARINGS

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/20/18	John D. Elrod	Prepare for (.2) and participate in (.8) telephonic attendance at status conference.	1.00	650.00
			<hr/>	
			Total Hours:	1.00
			Total Amount:	\$ 650.00

TIMEKEEPER SUMMARY FOR TASK CODE 833,

COURT HEARINGS

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	1.00	650.00	650.00
Totals:	1.00	650.00	\$ 650.00

Invoice No.: 4952347
Matter No.: 102171.013500

Page 3

Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
John D. Elrod	1.00	650.00	650.00
Nancy A. Peterman	2.80	650.00	1,820.00
Totals:	3.80	650.00	\$ 2,470.00

Invoice No.: 4952347
Re: Curae Health, Inc.
Matter No.: 102171.013500

Page 4

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
11/20/18	VENDOR: Elrod, John D. INVOICE#: 2927314911271124 DATE: 11/27/2018 Court Costs; 11/20/18 - Attorneys telephonic hearing appearance regarding Curae Health; Merchant: US Bankrutpcy Court, Middle District of Tennessee	\$ 70.00
Total Expenses:		\$ 70.00

Invoice No. : 4964405
File No. : 102171.013500
Bill Date : January 7, 2019

Suzanne Koenig, as Patient Care Ombudsman
SAK Management Services, LLC
300 Saunders Rd.
Suite 300
Riverwoods, IL 60015

Attn: Suzanne Koenig

INVOICE

Re: Curae Health, Inc.

Legal Services through December 31, 2018:

SALE OF PROPERTY: \$ 1,889.50

Total Fees: \$ 1,889.50

Current Invoice: \$ 1,889.50

NAP:MK

Tax ID: 13-3613083

Invoice No. : 4964405
File No. : 102171.013500

***FOR YOUR CONVENIENCE,
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT
FOR FEES & COSTS ARE AS FOLLOWS:***

PLEASE RETURN WITH YOUR PAYMENT

CLIENT NAME: SUZANNE KOENIG, AS PATIENT CARE OMBUDSMAN
FILE NUMBER:

INVOICE NUMBER: 4964405*

BILLING

PROFESSIONAL: Nancy A. Peterman

Current Invoice: \$ 1,889.50

Total Amount Due: \$ 1,889.50

For Wire and ACH Instructions:

TO: CITIBANK, N.A.
ABA #: 266086554
CREDIT TO: GREENBERG TRAURIG ACCOUNT
ACCOUNT #: 3200175071

PLEASE

REFERENCE: **CLIENT NAME:** SUZANNE KOENIG, AS PATIENT CARE
OMBUDSMAN
FILE NUMBER: 102171.013500
INVOICE NUMBER: 4964405*
BILLING
PROFESSIONAL: Nancy A. Peterman

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**

NAP:MK

Tax ID: 13-3613083

Description of Professional Services Rendered:

TASK CODE: 838 SALE OF PROPERTY

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/20/18	DeWitt Perkins	Analysis of current status of Debtors' sale of their three hospitals.	3.10	1,224.50
12/22/18	Nancy A. Peterman	Review and analysis of status of hospital sales/transfers and related records/patient issues (.40); draft email to S. Koenig re same (.10); draft email to D. Gordon re same (.20).	0.70	665.00
			Total Hours:	3.80
			Total Amount:	\$ 1,889.50

TIMEKEEPER SUMMARY FOR TASK CODE 838,

SALE OF PROPERTY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Nancy A. Peterman	0.70	950.00	665.00
DeWitt Perkins	3.10	395.00	1,224.50
Totals:	3.80	497.24	\$ 1,889.50

Invoice No.: 4964405
Matter No.: 102171.013500

Page 2

Description of Professional Services Rendered

TIMEKEEPER ACTIVITY GRAND TOTAL SUMMARY

<u>Timekeeper Name</u>	<u>Hours Billed</u>	<u>Rate</u>	<u>Total \$ Amount</u>
Nancy A. Peterman	0.70	950.00	665.00
DeWitt Perkins	3.10	395.00	1,224.50
Totals:	3.80	497.24	\$ 1,889.50

EXHIBIT C

Summary Cover Sheet

Name of Applicant	Greenberg Traurig, LLP
Name of Client	Curae Health, Inc. Patient Care Ombudsman
Time Period Covered by this Application	September 18, 2018 – January 31, 2019
Total Compensation Sought This Period	\$15,714.50
Total Expenses Sought This Period	\$545.63
Petition Date	August 24, 2018
Retention Date	September 18, 2018
Date of Order Approving Employment	November 1, 2018
Total Compensation Approved by Interim Order to Date	\$0
Total Expenses Approved by Interim Order to Date	\$0
Compensation Sought in this Application Already Paid Pursuant to a Monthly Compensation Order But Not Yet Allowed	None
Expenses Sought in this Application Already Paid Pursuant to a Monthly Compensation Order But Not Yet Allowed	None
Number of Professionals Included in this Application	4
Number of Professionals Billing Fewer than 15 Hours to the Case During this Period	4
Case Name	Curae Health, Inc. <i>et al.</i>
Case Number	18-05665
Date of Application	February 26, 2019
Interim or Final	Interim

EXHIBIT D

Summary of Time Keepers

Name	Title	Practice Group	Fees Billed	Hours Billed	Hourly Rate Billed in this Application
Nancy Peterman	Shareholder	Bankruptcy	\$5,865.00	8.7	650.00
John Elrod	Shareholder	Bankruptcy	\$8,580.00	13.2	650.00
Dewitt Perkins	Practice Group Attorney	Bankruptcy	\$1,224.50	3.10	395.00
Carla Greenberg	Staff	Bankruptcy	\$45.00	.30	150.00
Total Fees			\$15,714.50		

EXHIBIT E

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Jessica Lamanna
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TN Secretary of State
State Capital
Nashville, TN 37243-1102

TN Secretary of State, Business
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C/o Ronald G. Steen, JR
Re: SpecialCare Hospital MGMT Corp
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Thompson Burton PLLC
c/o Ronald G. Steen, JR
Re: Aesynt, Incorporated
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Thompson Burton PLLC,
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Re: MS Blood Services
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