

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

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<i>In re:</i>	:	Chapter 11
	:	
Curae Health, Inc., <i>et al.</i> <sup>1</sup>	:	Case No. 18-05665
	:	(Jointly Administered)
	:	
Debtors.	:	Judge Walker
	:	
	:	

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**AFFIDAVIT OF POSTING AND AFFIDAVIT OF SERVICES FOR  
NOTICE OF PATIENT CARE OMBUDSMAN REPORT**

STATE OF GEORGIA     )  
                                  )  
COUNTY OF FULTON    )

John D. Elrod, being duly sworn deposes and says:

1. I am not a party to this action. I am over the age of eighteen years and reside in Atlanta, Georgia. I am a Shareholder of Greenberg Traurig, LLP, counsel to the Patient Care Ombudsman.

2. In accordance with the Order Pursuant to 11 U.S.C. § 333 and Fed. R. Bankr. P. 2001.2 Directing the Appointment of a Patient Care Ombudsman [Docket No. 111], on March 5, 2019, a true and accurate copy of the **Notice Ombudsman’s Oral Third Report** (the “**Notice**”), annexed hereto as **Exhibit A** was emailed to Paula Thompson, Joel Southern and Lee Anne Montgomery at Clarksdale Regional Medical Center Inc.; and Jennifer Williams, Wayne Thompson, Teresa Gore and Alecia Benson at Batesville Regional Medical Center to be posted in two locations at each facility.

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<sup>1</sup> 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).

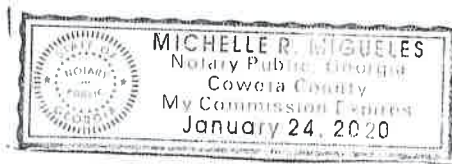
ACTIVE 41513215v2

3. On March 5, 2019, LeeAnne Montgomery at Clarksdale Regional Medical Center Inc. confirmed that this Notice was posted in two locations at the facility and on March 5, 2019, Alecia Benson at Batesville Regional Medical Center confirmed that she was posting the Notice at two locations at the facility.

  
\_\_\_\_\_  
John D. Elrod

Sworn to before me this  
4 day of March, 2019.

  
\_\_\_\_\_  
Michelle R. Migueles  
Notary Public



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**EXHIBIT A**

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

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<i>In re:</i>	:	Chapter 11
	:	
Curae Health, Inc., <i>et al.</i> <sup>2</sup>	:	Case No. 18-05665
	:	(Jointly Administered)
	:	
Debtors.	:	Judge Walker
	:	
	:	

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**NOTICE OF OMBUDSMAN’S ORAL THIRD REPORT**

PLEASE TAKE NOTICE that on September 18, 2018, Suzanne Koenig was appointed as the Patient Care Ombudsman in the above-captioned Chapter 11 cases by the United States Trustee for Region Eight, pursuant to an Order of the United States Bankruptcy Court for the Middle District of Tennessee. The Notice of Appointment of Patient Care Ombudsman (the “Appointment Notice”) is attached hereto as **Exhibit 1**. The Appointment Notice sets forth the Patient Care Ombudsman’s duties, which duties include:

1. monitoring the quality of patient care provided to patients of the Debtors, to the extent necessary under the circumstances, including interviewing patients and physicians;
2. reporting to the Court after notice to the parties in interest, at a hearing or in writing, regarding the quality of patient care provided to patients of the Debtors; and
3. if the Patient Care Ombudsman determines that the quality of patient care provided to patients of the Debtors is declining significantly or is otherwise being materially compromised, filing with the Court a motion or a written report, with notice to the parties in interest immediately upon making such determination.

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<sup>2</sup> 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).

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**PLEASE TAKE FURTHER NOTICE** that the Patient Care Ombudsman will be give her third report (the “**Report**”) orally to the Court on Tuesday, March 12, 2019 at 1:00 p.m. (Central Time).

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**EXHIBIT 1**

**Notice of Appointment of Patient Care Ombudsman**

*ACTIVE 41513215v2*

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> <sup>1</sup>	)	Case No. 18-05665
	)	
	)	Judge Walker
Debtors.	)	Jointly Administered

**NOTICE OF APPOINTMENT OF PATIENT CARE OMBUDSMAN**

The Acting United States Trustee, Region 8, pursuant to section 333 of the Bankruptcy Code and this Court's order dated September 6, 2018 (Docket Entry 111) directing the appointment of a health care ombudsman, hereby appoints Suzanne Koenig, having an office located at SAK Management Services, LLC, 300 Saunders Rd, Suite 300, Riverwoods, Illinois 60015, as the Patient Care Ombudsman in these cases. The appointee's verified statement of disinterestedness is attached as **Exhibit 1**.

Section 333(b, c) of the Bankruptcy Code provides, in part:

**(2)(A)** If the court orders the appointment of an ombudsman under paragraph (1), the United States trustee shall appoint 1 disinterested person (other than the United States trustee) to serve as such ombudsman.

**(B)** If the debtor is a health care business that provides long-term care, then the United States trustee may appoint the State Long-Term Care Ombudsman appointed under the Older Americans Act of 1965 for the State in which the case is pending to serve as the ombudsman required by paragraph (1).

**(C)** If the United States trustee does not appoint a State Long-Term Care Ombudsman under subparagraph (B), the court shall notify the State Long-Term Care Ombudsman appointed under the Older Americans Act of 1965 for the State in which the case

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is pending, of the name and address of the person who is appointed under subparagraph (A).

(b) An ombudsman appointed under subsection (a) shall--

(1) monitor the quality of patient care provided to patients of the debtor, to the extent necessary under the circumstances, including interviewing patients and physicians;

(2) not later than 60 days after the date of appointment, and not less frequently than at 60-day intervals thereafter, report to the court after notice to the parties in interest, at a hearing or in writing, regarding the quality of patient care provided to patients of the debtor; and

(3) if such ombudsman determines that the quality of patient care provided to patients of the debtor is declining significantly or is otherwise being materially compromised, file with the court a motion or a written report, with notice to the parties in interest immediately upon making such determination.

(c)(1) An ombudsman appointed under subsection (a) shall maintain any information obtained by such ombudsman under this section that relates to patients (including information relating to patient records) as confidential information. Such ombudsman may not review confidential patient records unless the court approves such review in advance and imposes restrictions on such ombudsman to protect the confidentiality of such records.

(2) An ombudsman appointed under subsection (a)(2)(B) shall have access to patient records consistent with authority of such ombudsman under the Older Americans Act of 1965 and under non-Federal laws governing the State Long-Term Care Ombudsman program.

Respectfully submitted,

**PAUL RANDOLPH,**  
Acting U.S. Trustee, Region 8

By: /s/ Megan Seliber  
MEGAN SELIBER  
Trial Attorney for the U.S. Trustee  
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Nashville, TN 37203  
(615) 695-4060; 615-736-2260 (fax)  
Megan.Seliber@usdoj.gov

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 2019, a true and correct copy of the foregoing was sent via this Courts ECF notification system to all parties who are registered to receive ECF notification in these cases and via United States, postage paid, first class mail to the following:

David Gordon, Esq.  
Polsinelli  
1201 West Peachtree Street, Ste. 1100  
Atlanta, GA 30309  
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Nashville, TN 37201  
*Counsel for Community Health Systems*

/s/ John D. Elrod \_\_\_\_\_  
John D. Elrod