

**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

EXPEDITED MOTION FOR HEARING ON MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) AUTHORIZING PAYMENT OF THE DIP OBLIGATIONS, (II) AUTHORIZING THE USE OF CASH COLLATERAL, (III) GRANTING ADEQUATE PROTECTION, (IV) MODIFYING THE AUTOMATIC STAY, AND (V) GRANTING RELATED RELIEF

The above captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in the above-captioned jointly administered chapter 11 cases (these “**Chapter 11 Cases**”), respectfully move the Court (this “**Motion for Hearing**”) for entry of an order (the “**Order**”), in substantially the form filed contemporaneously herewith, setting an expedited hearing on the *Expedited Motion of Debtors for Entry of an Order (I) Authorizing Debtors to Pay the DIP Obligations, (II) Authorizing the Use of Cash Collateral, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief* filed contemporaneously herewith (the “**Motion**”).² In support of this Motion for Hearing, the Debtors respectfully state as follows:

NEED FOR EXPEDITED RELIEF PURSUANT TO LOCAL RULE 9075-1

1. Expedited Relief Requested. Local Rule 9075-1 allows the Court to grant

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).

² Capitalized terms used herein but not otherwise defined shall have the meaning ascribed to them in the Motion.

emergency orders for expedited motions. Pursuant to Local Rule 9075-1(b), the Debtors request the Court set a hearing on the Motion on an expedited basis.

2. Basis for Urgency. An expedited hearing on the Motion is necessary because the Debtors have urgent need for relief with respect to payment of the DIP Obligations and the use of Cash Collateral. At this time, the Debtors are unable to access Cash Collateral to operate Panola Medical Center. Debtors have an immediate need for the use of Cash Collateral to keep Panola Medical Center open and operating until such time as Purchaser is able to go forward with the Closing or Debtors can identify another buyer that can purchase and operate Panola Medical Center. The Debtors have determined that absent the use of Cash Collateral, there would be an immediate need to shut down the Panola Medical Center, irreparably harming the Debtors' estates and creditors. The Debtors further have a need for the use of Cash Collateral to fund administrative expenses in these Chapter 11 Cases until the Plan can be confirmed at the Confirmation Hearing. Therefore, the Debtors' immediate access to Cash Collateral is necessary to preserve and maximize the value for the benefit of all parties in interest, including patients.

3. Notice. Concurrently with the filing of this Motion, the Debtors shall provide notice of this Motion to: (a) the Office of the United States Trustee for the Middle District of Tennessee; (b) Centers for Medicare and Medicaid Services; (c) State of Tennessee Department of Health Division of Licensure and Regulation Office of Health Care Facilities; (d) Mississippi State Department of Health; (e) counsel to the official committee of unsecured creditors established in these cases pursuant to Section 1102 of the Bankruptcy Code; (f) ServisFirst Bank and its counsel; (g) Midcap Financial Trust and its counsel; (h) CHS/Community Health Systems, Inc. and its counsel (i) all Tennessee local counsel having entered a notice of appearance in these cases; (j) the Internal Revenue Service; (k) the Tennessee Attorney

General's Office; (l) the Mississippi Attorney General's Office; (m) the Tennessee Secretary of State; (n) the patient care ombudsman and her counsel; (o) Medhost and its counsel; (p) Schumacher and its counsel, and (q) any party that has requested notice pursuant to Bankruptcy Rule 2002. Service is being executed via the Court's CM/ECF system, email, hand delivery, and/or overnight mail.

4. Suggested Hearing Date. Pursuant to the *Notice of Hearing Status Conference Regarding Panola Medical Center* [Docket No. 839], any matter pertaining to the operation and/or sale of the Panola Medical Center will be heard at the status hearing on March 12, 2019 at 1:00 p.m. Central Time. Accordingly, the Debtors request a hearing date on the Motion on **March 12, 2019 at 1:00 p.m. Central Time.**

5. Support. Debtors support for expedited relief is set forth in detail in the Motion.

WHEREFORE, Debtors request that this Court enter an order setting a hearing on the Motion for **March 12, 2019 at 1:00 p.m. Central Time** and granting such other and further relief as this Court may deem just and proper.

Dated: March 8, 2019
Nashville, Tennessee

Respectfully submitted,

POLSINELLI PC

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