

**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

**OBJECTION BY SERVISFIRST BANK TO
THE STATE OF MISSISSIPPI DIVISION OF MEDICAID’S
MOTION TO (I) APPROVE ITS ADMINISTRATIVE EXPENSE,
AND COMPEL PAYMENT THEREOF, AND
(II) UPON ANY FAILURE TO PAY THAT THE
DEBTOR(S) BE REQUIRED TO APPEAR AT A HEARING TO
SHOW CAUSE AND FOR THE COURT TO HEAR AND CONSIDER
WHETHER TO DISMISS OR CONVERT THE PROCEEDINGS**

ServisFirst Bank, by and through counsel, hereby files this Objection (the “Objection”) to *The State of Mississippi Department of Medicaid’s Motion to (I) Approve its Administrative Expense, and Compel Payment Thereof, and (II) Upon Any Failure to Pay That The Debtor(s) Be Required to Appear at a Hearing to Show Cause and for the Court to Hear and Consider Whether to Dismiss or Convert the Case* (the “Motion”) [Doc. No. 758] (the “Motion”).

ServisFirst Bank objects to the Motion based on and hereby incorporates by reference the objections and legal arguments set forth in the *Joint Objection of the Debtors and Official Committee of Unsecured Creditors Opposing the State of Mississippi Division of Medicaid’s Motion and Joint Cross-Motion of The Debtors and Official Committee of Unsecured Creditors*

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).
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Seeking (A) Payment of Actual Damages for the State of Mississippi Division of Medicaid's Willful Violations of the Automatic Stay and (B) Turnover of Estate Funds [Doc. No. 901].

WHEREFORE, ServisFirst Bank hereby respectfully requests that this Court sustain this Objection; deny the Motion in its entirety; and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

NEAL & HARWELL, PLC

/s/ David G. Thompson
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Counsel for ServisFirst Bank

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served through the Bankruptcy Court's ECF system on all parties registered to receive electronic notice in this case on this the 26th day of March, 2019.

/s/ David G. Thompson