

**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
	)	
1721 Midpark Road, Suite B200	)	Judge Walker
Knoxville, TN 37921	)	
Debtors.	)	Jointly Administered

**WITNESS AND EXHIBIT LIST FOR HEARING ON: (I) THE DIVISION OF  
MEDICAID’S MOTION FOR AN ADMINISTRATIVE EXPENSE CLAIM [DOCKET  
NO. 758] AND (II) THE DEBTORS AND THE COMMITTEE’S JOINT CROSS-  
MOTION [DOCKET NO. 901]**

The above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in these jointly administered bankruptcy cases respectfully submit this witness and exhibit list in connection with the hearing set for April 9, 2019 at 10:00 a.m. (the “**Hearing**”) on (I) The State of Mississippi Division of *Medicaid’s Motion for An Administrative Expense Claim* (the “**Motion**”) [Docket No. 758] and (II) *the Debtors’ and the Official Committee Of Unsecured Creditors Joint Objection to the State of Mississippi Division of Medicaid’s Motion and Joint Cross Motion of the Debtors and Official Committee of Unsecured Creditors 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* [Docket No. 901] (the “**Joint Cross Motion**”).

**A. Witness List**

The Debtors identify the following witnesses that may testify in the Hearing:

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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).

a. **Stephen Clapp.** Mr. Clapp, on behalf of the Debtors, is expected to testify regarding any and all matters related to the Motion and the Joint Cross Motion.

b. Any Witness necessary to authenticate a document.

c. Any rebuttal and/or impeachment witnesses.

d. Any person listed on the witness list of another party.

**B. Exhibit List**

1. The Debtors' Exhibits A through C attached to the Debtors Response/Cross Motion.

2. Copy of Guaranty Bank Check No. 223960, Dated March 15, 2019 sent to the Division of Medicaid in the amount of \$363,443.09.

3. Proof of Claim No. 263-1 filed on February 12, 2019 by the State of Mississippi, Division of Medicaid.

4. Any exhibits listed on any other parties' exhibit list.

The Debtors reserve the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing lists of witnesses and exhibits as appropriate. The Debtors also reserve the right to rely upon and use as evidence (i) additional documents produced by the Debtors, (ii) exhibits included on the exhibit lists of any other parties in interest, and (iii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: April 5, 2019  
Nashville, Tennessee

Respectfully submitted,

**POLSINELLI PC**

/s/ Michael Malone

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-and-

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*Counsel to the Debtors and  
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