

**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

**SUPPLEMENTAL DECLARATION OF STEPHEN A. MCSWEEN, ESQ. IN SUPPORT
OF THE APPLICATION OF DEBTORS TO AUTHORIZE THE RETENTION AND
EMPLOYMENT OF EGERTON, MCAFEE, ARMISTEAD & DAVIS, P.C. AS SPECIAL
TRANSACTIONAL COUNSEL TO THE DEBTORS *NUNC PRO TUNC* TO THE
PETITION DATE**

Stephen A. McSween, Esq., a partner of Egerton, McAfee, Armistead & Davis, P.C., makes this Supplemental Declaration pursuant to 28 U.S.C. § 1746 and states:

1. I am a Shareholder in Egerton, McAfee, Armistead & Davis, P.C. (“**Egerton**”), which maintains its office for the practice of law at 900 S. Gay Street, Suite 1400 Knoxville, TN 37902. I am an attorney-at-law, duly admitted and in good standing to practice in the State of Tennessee. I have submitted a notice of appearance in these Chapter 11 Cases.

2. I submit this Supplemental Declaration (the “**Declaration**”) in connection with the Debtors’ application for authority to employ and retain Egerton as special transactional counsel to the Debtors *nunc pro tunc* to the Petition Date, filed on August 24, 2018 [Docket No. 15] (the “**Application**”)².

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 not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth below. To the extent that any information disclosed in this Declaration requires amendment or modification upon Egerton's completion of further analysis or as additional creditor information becomes available to Egerton, a supplemental declaration will be submitted to this Court.

4. As of August 24, 2018, Egerton was owed \$358,319.52 for prepetition legal services and expenses rendered to the Debtors. Egerton agrees that, upon entry of an order approving the Application, Egerton shall waive its prepetition claim against the Debtors.

5. By reason of the foregoing, I believe that Egerton is eligible for employment and retention by the Debtors pursuant to Bankruptcy Code section 327 and the applicable Bankruptcy Rules.

6. Egerton has not previously represented a hospital debtor in a Chapter 11 case as either general or special counsel and does not have a pre-existing standard hourly rate for such services in such a Chapter 11 case. Egerton has determined the hourly rates proposed are reasonable for the services Egerton expects to perform in these cases. Moreover, having previously represented the Debtors in healthcare transactions, contracts and regulatory matters, Egerton is already familiar with many of the parties, contracts and legal issues regularly encountered by the Debtor.

7. The foregoing constitutes the statement of Egerton pursuant to Bankruptcy Code section 327 and Bankruptcy Rules 2014(a) and 2016(b).

I certify under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: September 26, 2018
Nashville, Tennessee

/s/ Stephen A. McSween
Stephen A. McSween