

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

In re:

Curae Health, Inc., *et al.*¹

1721 Midpark Road, Suite B200
Knoxville, TN 37921

Debtors.

Chapter 11

Case No. 18-05665

Judge Walker

Jointly Administered

Hearing Date: September 25, 2018

Objection Deadline: September 21, 2018

Re: Docket Nos. 10, 306

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS WITNESS AND EXHIBIT
LIST FOR THE OBJECTION OF OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO EXPEDITED MOTION OF DEBTORS FOR ENTRY OF INTERIM
AND FINAL ORDERS: (I) AUTHORIZING THE DEBTORS TO (A) OBTAIN
POSTPETITION SECURED FINANCING AND (B) UTILIZE CASH COLLATERAL,
(II) GRANTING LIENS AND SUPERPRIORITY ADMINISTRATIVE EXPENSE
STATUS, (III) GRANTING ADEQUATE PROTECTION, (IV) MODIFYING THE
AUTOMATIC STAY, AND (V) SCHEDULING A FINAL HEARING**

The Official Committee of Unsecured Creditors (the “Committee”) of Curae Health, Inc., *et al.* (collectively, the “Debtors”), by and through its undersigned counsel, hereby files this witness and exhibit list in connection with the hearing (the “Hearing”) on the *Expedited Motion of Debtors for Entry of Interim and Final Orders: (I) Authorizing the Debtors to (A) Obtain Postpetition Secured Financing and (B) Utilize Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Status, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, and (V) Scheduling a Final Hearing* (the “DIP Motion”) [Docket No. 10].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 used but not defined herein shall have the meanings ascribed to them in the DIP Motion.

Witness List

The Committee identifies the following witness that may testify in the Hearing:

1. Allen Wilen. Mr. Wilen is the National Director of the Financial Advisory Services Group of EisnerAmper LLP, the proposed financial advisors and accountants for the Committee. He is expected to testify regarding any and all matters related to the Committee's Objection to the DIP Motion [Docket No. 306].

Exhibit List

The Committee identifies the following exhibits that it may present in the Hearing:

1. Week 5 Variance Analysis [Docket No. 306, Exhibit A];
2. Debtors' Budget [Docket No. 306, Exhibit B];
3. Cumulative Entity-by-Entity Week 4 Variance Analysis [Docket No. 306, Exhibit C];
4. Week 4 Cumulative Variance Analysis [Docket No. 306, Exhibit D]; and
5. Certification of Allen Wilen [Docket No. 306, Exhibit E].

Dated: October 12, 2018

/s/ Michael E. Collins
Michal E. Collins (Bar No. 16036)
Robert W. Miller (Bar No. 31918)
1201 Demonbreun Street, Suite 900
Nashville, TN 37203
Telephone: (615)-244-0030
Facsimile: (615) 242-4203
Email: mcollins@manierherod.com
rmiller@manierherod.com

*Counsel for the Official Committee of Unsecured
Creditors of Curae Health, Inc., et al.*

- and -

Andrew H. Sherman
Boris I. Mankovetskiy
SILLS CUMMIS & GROSS P.C.
One Riverfront Plaza
Newark, NJ 07102
Telephone: 973-643-7000
Facsimile: 973-643-6500
Email: asherman@sillscummis.com
bmankovetskiy@sillscummis.com

*Proposed Co-Counsel for the Official Committee of
Unsecured Creditors of Curae Health, Inc., et al.*

CERTIFICATE OF SERVICE

I hereby certify that on October 12, 2018, a copy of the foregoing was sent via ECF to all parties registered to receive electronic notice in the case, including the following:

Polsinelli
c/o David Gordon
1201 West Peachtree Street
Suite 1100
Atlanta GA 30309

Waller Lansden Dortch &
Davis, LLP
c/o David Lemke
511 Union Street
Suite 2700
Nashville TN 37219

Neal & Harwell, PLC
c/o David Thompson
1201 Demonbreun Street,
Suite 1000
Nashville TN 37203

Proposed Counsel for the
Debtors

Counsel for Midcap
Funding IV Trust

Counsel for ServisFirst Bank

Office of the United States
Trustee
c/o Megan Seliber
318 Customs House
701 Broadway
Nashville TN 37203

Bass, Berry & Sims PLC
c/o Paul Jennings
150 Third Avenue South
Suite 2800
Nashville TN 37201

Counsel for the United States
Trustee

Counsel for Community
Health Systems

/s/ Michael E. Collins
Michael E. Collins