

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

In re:

Curae Health, Inc., *et al.*<sup>1</sup>

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. 7, 307

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS WITNESS AND EXHIBIT  
LIST FOR THE OBJECTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS TO EXPEDITED MOTION OF DEBTORS FOR AN ORDER  
AUTHORIZING: (I) THE CONTINUED USE OF EXISTING CASH MANAGEMENT  
SYSTEM, INCLUDING MAINTENANCE OF EXISTING BANK ACCOUNTS,  
CHECKS, AND BUSINESS FORMS; (II) SUSPENSION OF CERTAIN U.S. TRUSTEE  
BANK ACCOUNT REQUIREMENTS; AND (III) CONTINUATION  
OF EXISTING DEPOSIT PRACTICES**

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 an Order Authorizing: (I) Continued Use of Existing Cash Management System, Including Maintenance of Existing Bank Accounts, Checks, and Business Forms, (II) Suspension of Certain U.S. Trustee Bank Account Requirements; and (III) Continuation of Existing Deposit Practices* [Docket No. 7] (the “Motion”) [Docket No. 7].<sup>2</sup>

---

<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).

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the 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 Motion [Docket No. 307].

### **Exhibit List**

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

1. Certification of Allen Wilen [Docket No. 307, Exhibit A];
2. Debtors' Budget [Docket No. 307, Exhibit B];
3. Cumulative Entity-by-Entity Week 4 Variance Analysis [Docket No. 307, Exhibit C]; and
4. Borrowing Base Report [Docket No. 307, Exhibit D].

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