

**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. 10, 306

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS AMENDED 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].<sup>2</sup>

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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).

<sup>2</sup> 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];
5. Certification of Allen Wilen [Docket No. 306, Exhibit E]; and
6. DIP Credit Agreement [Docket No. 10, Exhibit A].

Dated: October 12, 2018

/s/ Michael E. Collins  
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- and -

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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:

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/s/ Michael E. Collins  
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