

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

In re: : Chapter 11
: :
Curae Health, Inc., *et al.*¹ : Case No. 18-05665
: (Jointly Administered)
: :
Debtors. : Judge Walker
: :
: Hearing Date: October 16, 2018
: Objection Deadline: October 9, 2018

Re: Docket Nos. 10, 293

PATIENT CARE OMBUDSMAN’S WITNESS AND EXHIBIT LIST FOR THE LIMITED OBJECTION OF PATIENT CARE OMBUDSMAN 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, GRANTING LIENS AND SUPERPRIORITY ADMINISTRATIVE EXPENSE STATUS, (III) GRANTING ADEQUATE PROTECTION, (IV) MODIFYING THE AUTOMATIC STAY, AND (V) SCHEDULING A FINAL HEARING

Suzanne Koenig, the patient care ombudsman (the “Ombudsman”) appointed in the above-captioned chapter 11 cases (the “Cases”), by and through her 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 Expenses 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 Ombudsman identifies the following witness that may testify in the Hearing:

1. Suzanne Koenig.
2. Any witnesses named by the Debtors, the proposed DIP Lender, or the Official Committee of Unsecured Creditors.
3. Any witness needed for impeachment.
4. Any witness needed for rebuttal.

Exhibit List

The Ombudsman identifies the following exhibits that she may introduce into evidence at the Hearing:

1. Debtors' Budget [Docket No. 306, Exhibit B].
2. Motion For Authority To Use Cash Collateral and Request for Emergency Hearing; *In re Hutcheson Medical Center, Inc., et al.*, Bankr. N.D. Ga. Case No. 14-42863-pwb dated November 20, 2014 at docket no. 7.
3. Second Interim Order Granting Motion for Authority to Use Cash Collateral, *In re Hutcheson Medical Center, Inc., et al.*, Bankr. N.D. Ga. Case No. 14-42863-pwb dated January 8, 2015 at docket no. 107.
4. Fourth Interim Order Granting Motion for Authority to Use Cash Collateral, *In re Hutcheson Medical Center, Inc., et al.*, Bankr. N.D. Ga. Case No. 14-42863-pwb dated March 6, 2015 at docket no. 176.
5. Various other cash collateral orders in the *In re Hutcheson Medical Center, Inc., et al.* cases.
6. Various First Day Declarations, DIP Financing Orders and Cash Collateral Orders from other bankruptcy cases in which Patient Care Ombudsmen have been appointed;
7. Week 4 Cumulative Variance Analysis [Docket No. 306, Exhibit D];
8. All exhibits listed by the Debtors, the proposed DIP Lender, or the Official Committee of Unsecured Creditors.
9. Any exhibits needed for impeachment.

10. Any exhibits needed for rebuttal.

Dated: October 12, 2018

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*Proposed Counsel to the Patient
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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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