

**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

EXPEDITED MOTION FOR HEARING ON DEBTORS' EXPEDITED MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING DEBTORS TO TRANSFER THE REVENUE CYCLE SERVICES FOR THE DEBTORS' FACILITIES TO MEDHOST OF TENNESSEE, INC., AND (II) GRANTING RELATED RELIEF

The above captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in the above-captioned jointly administered chapter 11 cases (these “**Chapter 11 Cases**”), respectfully move the Court (this “**Motion for Hearing**”) for entry of an order (the “**Order**”), in substantially the form filed contemporaneously herewith, setting an expedited hearing on the *DEBTORS' EXPEDITED MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING DEBTORS TO TRANSFER THE REVENUE CYCLE SERVICES FOR THE DEBTORS' FACILITIES TO MEDHOST OF TENNESSEE, INC., AND (II) GRANTING RELATED RELIEF* filed contemporaneously herewith (the “**Motion**”).² In support of this Motion for Hearing, the Debtors respectfully state as follows:

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 herein but not otherwise defined shall have the meaning ascribed to them in the Motion.

NEED FOR EXPEDITED HEARING PURSUANT TO LOCAL RULE 9075-1

1. Expedited Relief Requested. Local Rule 9075-1 allows the Court to grant emergency orders for expedited motions. Pursuant to Local Rule 9075-1(b), the Debtors request the Court set a hearing on the Motion on an expedited basis.

2. Basis for Urgency. An expedited hearing on the Motion is necessary because the Debtors have urgent need for relief with respect to the Revenue Cycle Services for the Facilities. Due to personnel losses and other factors, Curae cannot continue performing the Revenue Cycle Services for the Facilities. Debtors believe that transferring the Revenue Cycle Services for the Facilities to MedHost will allow the Debtors to maximize revenue and will minimize expenses for the Debtors' estates. Accordingly, Debtors seek an expedited hearing on the Motion to authorize the Debtors to transition the Revenue Cycle Services to MedHost.

3. Notice. Concurrently with the filing of this Motion, the Debtors shall provide notice of this Motion to: (a) the Office of the United States Trustee for the Middle District of Tennessee; (b) Centers for Medicare and Medicaid Services; (c) State of Tennessee Department of Health Division of Licensure and Regulation Office of Health Care Facilities; (d) Mississippi State Department of Health; (e) counsel to the official committee of unsecured creditors established in these cases pursuant to Section 1102 of the Bankruptcy Code; (f) ServisFirst Bank and its counsel; (g) Midcap Financial Trust and its counsel; (h) CHS/Community Health Systems, Inc. and its counsel (i) all Tennessee local counsel having entered a notice of appearance in these cases; (j) the Internal Revenue Service; (k) the Tennessee Attorney General's Office; (l) the Mississippi Attorney General's Office; (m) the Tennessee Secretary of State; (n) Medhost and its counsel; (o) the patient care ombudsman and her proposed counsel;

and (p) any party that has requested notice pursuant to Bankruptcy Rule 2002. Service is being executed via the Court's CM/ECF system, email, hand delivery, and/or overnight mail.

4. Suggested Hearing Date. The Debtors request a hearing date on the Motion on **October 23, 2018 at 2:00 p.m.**

5. Support. Debtors support for this Motion for Hearing is set forth in detail in the Motion and the exhibits attached thereto.

WHEREFORE, Debtors request that this Court enter an order setting a hearing on the Motion for **October 23, 2018 at 2:00 p.m.** and granting such other and further relief as this Court may deem just and proper.

Dated: October 19, 2018

Nashville, Tennessee

Respectfully submitted,

POLSINELLI PC

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