

**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

WITNESS AND EXHIBIT LIST FOR HEARING ON DEBTORS’ (I) DIP FINANCING MOTION, (II) CASH MANAGEMENT MOTION, (III) MOTION TO SHUT DOWN OR TRANSFER OPERATIONS OF THE CLARKSDALE FACILITIES, AND (IV) MOTION TO TRANSFER REVENUE CYCLE SERVICES TO MEDHOST OF TENNESSEE, INC.

The above-captioned debtors and debtors-in-possession (collectively, the “**Debtors**”) in these jointly administered bankruptcy cases respectfully submit this amended 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 Financing Motion**”) [Docket No. 10]; 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* (the “**Cash Management Motion**”) [Docket No. 7]; *Debtors’ Emergency Motion for Entry or an Order Authorizing Debtors to: (I)(A) Shut Down the*

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).

Clarksdale Hospital; (B) Reject Unexpired Leases and Contracts of Clarksdale; and (C) Receive Related Relief; or, in the Alternative; (II)(A) Transfer Operations of the Clarksdale Hospital to a New Operator Free and Clear of any Liens, Claims, or Encumbrances Pursuant to an Operations Transfer Agreement to be Filed with the Court; (B) Assume and Assign the Coahoma County Lease and Certain Other Unexpired Leases and Contracts Requested by the New Operator and (C) Receive Related Relief (the “Clarksdale Motion”) [Docket No. 314]; 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 “Revenue Cycle Services Motion”) [Docket No. 343].

A. Witness List

The Debtors identify the following witnesses that may testify in the Hearing.

a. **Stephen Clapp.** Mr. Clapp, on behalf of the Debtors, is expected to testify regarding any and all matters related to the Debtors’ DIP Financing Motion, the Cash Management Motion, the Clarksdale Motion, and the Revenue Cycle Services Motion.

b. **Marshall Glade.** Mr. Glade, financial advisor to the Debtors, is expected to testify regarding any and all financial matters related to the Debtors’ DIP Financing Motion, the Cash Management Motion, the Clarksdale Motion, and the Revenue Cycle Services Motion.

c. **Brett Robinson.** Mr. Robinson, on behalf of Midcap Financial Trust, is expected to testify regarding any all matters related to the Debtors’ DIP Financing Motion.

B. Exhibit List

1. DIP Credit Agreement attached to the DIP Financing Motion as Exhibit A [Docket No. 10];
2. The Budget filed with the Court at Docket No. 250, as amended; and

3. Any other exhibits listed on an objecting parties' Exhibit List.

Dated: October 19, 2018
Nashville, Tennessee

Respectfully submitted,

POLSINELLI PC

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