

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
	§	
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, <i>et al.</i> ,	§	
	§	(Jointly Administered)
Debtors. ¹	§	
	§	
	§	

**AGENDA OF MATTERS SET FOR HYBRID
HEARING ON SEPTEMBER 4, 2024 AT 10:00 A.M. (CENTRAL TIME)**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON SEPTEMBER 4, 2024 AT 10:00 A.M. (CENTRAL TIME) IN COURTROOM 401, 4TH FLOOR, 515 RUSK AVENUE, HOUSTON, TX 77002. YOU MAY PARTICIPATE IN THE HEARING IN-PERSON OR BY AN AUDIO AND VIDEO CONNECTION.

AUDIO COMMUNICATION WILL BE BY USE OF THE COURT'S DIAL-IN FACILITY. YOU MAY ACCESS THE FACILITY AT 832-917-1510. ONCE CONNECTED, YOU WILL BE ASKED TO ENTER THE CONFERENCE ROOM NUMBER. JUDGE LOPEZ'S CONFERENCE ROOM NUMBER IS 590153. VIDEO COMMUNICATION WILL BE BY USE OF THE GOTOMEETING PLATFORM. CONNECT VIA THE FREE GOTOMEETING APPLICATION OR CLICK THE LINK ON JUDGE LOPEZ'S HOME PAGE. THE MEETING CODE IS "JUDGELOPEZ". CLICK THE SETTINGS ICON IN THE UPPER RIGHT CORNER AND ENTER YOUR NAME UNDER THE PERSONAL INFORMATION SETTING.

HEARING APPEARANCES MUST BE MADE ELECTRONICALLY IN ADVANCE OF BOTH ELECTRONIC AND IN-PERSON HEARINGS. TO MAKE YOUR APPEARANCE, CLICK THE "ELECTRONIC APPEARANCE" LINK ON JUDGE LOPEZ'S HOME PAGE. SELECT THE CASE NAME, COMPLETE THE REQUIRED FIELDS AND CLICK "SUBMIT" TO COMPLETE YOUR APPEARANCE.

Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "Debtors"), hereby file this Agenda of Matters Set for Hearing on **September 4, 2024 at 10:00 a.m. (Central Time)** before the Honorable Christopher M. Lopez.

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

I. MASSACHUSETTS HOSPITALS SALE HEARING

A. Holy Family Methuen Hospital and Holy Family Haverhill Hospital

- 1. Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 281)**

Status: This matter is going forward.

Responses:

- A. Supplemental Limited Objection and Reservation of Rights of Sodexo Operations, LLC and Affiliates to Debtors' Proposed Sale of Substantially All of Their Assets (Docket No. 1701)
- B. Global Healthcare Exchange, LLC's Limited Objection to Debtors' Sale of First Round Hospitals and Proposed Adequate Assurance with Respect to Executory Contracts, and Reservation of Rights (Docket No. 1704)
- C. Limited Objection and Reservation of Rights of Catholic Health Initiatives Colorado, Commonspirit Health, and Centura Health Corporation to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 1754)
- D. The United States' Objection and Reservation of Rights Regarding Debtors' Proposed Sales of Additional 'First Round Hospitals' and Stewardship Health Assets (Docket No. 1946)
- E. Limited Objection and Reservation of Rights to the Roman Catholic Archbishop of Boston, a Corporate Sole to the Sale of Certain Massachusetts Hospitals and Related Assets (Docket No. 1963)
- F. Limited Objection of Atlantic Specialty Insurance Company to Debtors' Sale of Assets – All Rounds (Docket No. 1966)
- G. Limited Objection of the Chubb Companies to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding

Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 1997)

- H. Pinnacle Consulting, LLC's Limited Objection to the Debtors' Sale of Assets Free and Clear of all Liens, Claims, and Encumbrances (Docket No. 2002)
- I. FILO Secured Parties' Objection and Reservation of Rights with Respect to the Hospital Sales (Docket No. 2043)
- J. Boston Sports Medicine, Inc.'s Limited Objection to Proposed Sale (Docket No. 2067)
- K. Limited Objection and Reservation of rights of Post Road Equipment Finance SPV, LLC to Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing with Respect to (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) Saint Anne's Hospital, and (D) Morton Hospital; and Reservation of Rights to Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2275)
- L. Supplemental Objection of the FILO DIP Lenders to Debtors' Proposed Sales of the Massachusetts Hospitals Free and Clear of Liens and Liabilities (Docket No. 2276)
- M. Second Supplemental Limited Objection and Reservation of Rights of Sodexo Operations, LLC and Affiliates to Debtors' Proposed Sale of the Massachusetts Hospitals (Docket No. 2277)
- N. Supplemental Response and Limited Objection of the Roman Catholic Archbishop of Boston, a Corporation Sole, to the Debtors' Proposed Sales of the Massachusetts Hospitals Free and Clear of Liens and Liabilities (Docket No. 2278)
- O. Blue Cross and Blue Shield of Massachusetts, Inc.'s Limited Objection and Reservation of Rights to the Sale Motion and Potential Assumption and Assignment of Executory Contracts in Connection with Sale (Docket No 2279)
- P. Reservation of Rights and Limited Objection of the Massachusetts Nurses Association to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family

Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242) and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2260) (Docket No. 2280)

- Q. Reservation of Rights and Limited Objection of The Nurses & Local 813 IBT Retirement Plan to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242) and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2260) (Docket No. 2281)
- R. Reservation of Rights of Medical Properties Trust, Inc. and the Master Lease II Lessors Regarding Notices of Sale for Massachusetts Hospitals (Docket No. 2282)
- S. Reservation of Rights and Limited Objection of the 1199 SEIU United Healthcare Workers East to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2283)
- T. United States' (IRS) Limited Objection to Sale Order and Asset Purchased Agreements for (I) Holy Family Methuen Hospital, (II) Holy Family Haverhill Hospital, (III) St. Anne's Hospital and (IV) Morton Hospital (Docket No. 2284)

Additional Adjourned Responses (Cure and Adequate Assurance Objections)

- A. See **Annex A**

Related Documents:

- A. Declaration of Toby King in Support of Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 426)
- B. Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 626)
- C. Notice of Sale, Global Bidding Procedures, Auction, and Sale Hearing (Docket No. 689)
- D. Notice of Extension of Certain Deadlines and Dates Under the Bidding Procedures Order (Docket No. 895)
- E. Notice of Adjournment of Sale Hearing (Docket No. 1720)
- F. Notice of Extension of Certain Deadlines and Dates Under the Bidding Procedures Order (Docket No. 1721)
- G. Notice of Sale Hearings (Docket No. 1934)
- H. Notice of Dates and Deadlines Under the Bidding Procedures Order (Docket No. 1993)
- I. Amended Declaration of Michael T. Abel, CPA in Support of United States Objection to Debtors' Motion to Sell First Round Hospitals Free and Clear of Medicare Statutory Obligations (Docket No. 2171)
- J. Notice of Sale Hearing (Docket No. 2193)
- K. Notice of Intent to Adduce Testimony From a Remote Location by Telephone and Audio Technology (Docket No. 2246)
- L. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on September 4, 2024 (Docket No. 2249)

- M. Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing with Respect to (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) Saint Anne's Hospital, and (D) Morton Hospital; and Reservation of Rights to Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242)
- N. Declaration of Toby King in Support of (I) the Sales of (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, and (C) St. Elizabeth's Medical Center, Free and Clear of Liens and Liabilities; and (II) Granting Related Relief (Docket No. 2261)
- O. Declaration of John R. Castellano in Support of the Sales of Massachusetts Hospitals Free and Clear of Liens and Liabilities; and Granting Related Relief (Docket No. 2263)
- P. Debtors' Witness and Exhibit List for Hearing on September 4, 2024 (Docket No. 2272)

B. Saint Anne's Hospital and Morton Hospital

- 2. **Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 281)**

Status: This matter is going forward.

Responses:

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- B. Global Healthcare Exchange, LLC's Limited Objection to Debtors' Sale of First Round Hospitals and Proposed Adequate Assurance with Respect to Executory Contracts, and Reservation of Rights (Docket No. 1704)
- C. Limited Objection and Reservation of Rights of Catholic Health Initiatives Colorado, Commonspirit Health, and Centura Health Corporation to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures

- and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 1754)
- D. The United States' Objection and Reservation of Rights Regarding Debtors' Proposed Sales of Additional 'First Round Hospitals' and Stewardship Health Assets (Docket No. 1946)
 - E. Limited Objection and Reservation of Rights to the Roman Catholic Archbishop of Boston, a Corporate Sole to the Sale of Certain Massachusetts Hospitals and Related Assets (Docket No. 1963)
 - F. Limited Objection of Atlantic Specialty Insurance Company to Debtors' Sale of Assets – All Rounds (Docket No. 1966)
 - G. Limited Objection of the Chubb Companies to Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 1997)
 - H. Pinnacle Consulting, LLC's Limited Objection to the Debtors' Sale of Assets Free and Clear of all Liens, Claims, and Encumbrances (Docket No. 2002)
 - I. FILO Secured Parties' Objection and Reservation of Rights with Respect to the Hospital Sales (Docket No. 2043)
 - J. Boston Sports Medicine, Inc.'s Limited Objection to Proposed Sale (Docket No. 2067)
 - K. Limited Objection and Reservation of rights of Post Road Equipment Finance SPV, LLC to Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing with Respect to (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) Saint Anne's Hospital, and (D) Morton Hospital; and Reservation of Rights to Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2275)
 - L. Supplemental Objection of the FILO DIP Lenders to Debtors' Proposed Sales of the Massachusetts Hospitals Free and Clear of Liens and Liabilities (Docket No. 2276)

- M. Second Supplemental Limited Objection and Reservation of Rights of Sodexo Operations, LLC and Affiliates to Debtors' Proposed Sale of the Massachusetts Hospitals (Docket No. 2277)
- N. Supplemental Response and Limited Objection of the Roman Catholic Archbishop of Boston, a Corporation Sole, to the Debtors' Proposed Sales of the Massachusetts Hospitals Free and Clear of Liens and Liabilities (Docket No. 2278)
- O. Blue Cross and Blue Shield of Massachusetts, Inc.'s Limited Objection and Reservation of Rights to the Sale Motion and Potential Assumption and Assignment of Executory Contracts in Connection with Sale (Docket No 2279)
- P. Reservation of Rights and Limited Objection of the Massachusetts Nurses Association to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242) and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2260) (Docket No. 2280)
- Q. Reservation of Rights and Limited Objection of The Nurses & Local 813 IBT Retirement Plan to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242) and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2260) (Docket No. 2281)
- R. Reservation of Rights of Medical Properties Trust, Inc. and the Master Lease II Lessors Regarding Notices of Sale for Massachusetts Hospitals (Docket No. 2282)
- S. Reservation of Rights and Limited Objection of the 1199 SEIU United Healthcare Workers East to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good

Samaritan Medical Center at Sale Hearing and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2283)

- T. United States' (IRS) Limited Objection to Sale Order and Asset Purchased Agreements for (I) Holy Family Methuen Hospital, (II) Holy Family Haverhill Hospital, (III) St. Anne's Hospital and (IV) Morton Hospital (Docket No. 2284)

Additional Adjourned Responses (Cure and Adequate Assurance Objections)

- A. See Annex A

Related Documents:

- A. Declaration of James Moloney in Support of Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 426)
- B. Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 626)
- C. Notice of Sale, Global Bidding Procedures, Auction, and Sale Hearing (Docket No. 689)
- D. Notice of Extension of Certain Deadlines and Dates Under the Bidding Procedures Order (Docket No. 895)
- E. Notice of Adjournment of Sale Hearing (Docket No. 1720)
- F. Notice of Extension of Certain Deadlines and Dates Under the Bidding Procedures Order (Docket No. 1721)
- G. Notice of Sale Hearings (Docket No. 1934)
- H. Notice of Dates and Deadlines Under the Bidding Procedures Order (Docket No. 1993)

- I. Amended Declaration of Michael T. Abel, CPA in Support of United States Objection to Debtors' Motion to Sell First Round Hospitals Free and Clear of Medicare Statutory Obligations (Docket No. 2171)
- J. Notice of Sale Hearing (Docket No. 2193)
- K. Notice of Intent to Adduce Testimony From a Remote Location by Telephone and Audio Technology (Docket No. 2246)
- L. The Official Committee of Unsecured Creditors' Witness and Exhibit List for Hearing on September 4, 2024 (Docket No. 2249)
- M. Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing with Respect to (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) Saint Anne's Hospital, and (D) Morton Hospital; and Reservation of Rights to Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242)
- N. Declaration of James Moloney in Support of (I) the Sales of (A) Morton Hospital, (B) Saint Anne's Hospital, and (C) Good Samaritan Medical Center, Free and Clear of Liens, Claims, Encumbrances, and Interests; and (II) Granting Related Relief (Docket No. 2262)
- O. Declaration of John R. Castellano in Support of the Sales of Massachusetts Hospitals Free and Clear of Liens and Liabilities; and Granting Related Relief (Docket No. 2263)
- P. Notice of Filing of Asset Purchase Agreement, Schedules, and Exhibits by and Among Certain Debtors, Lifespan of Massachusetts, Inc., and Lifespan Corporation (Docket No. 2266)
- Q. Debtors' Witness and Exhibit List for Hearing on September 4, 2024 (Docket No. 2272)

C. St. Elizabeth's Medical Center and Good Samaritan Medical Center

- 3. **Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 281)**

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- M. Supplemental Response and Limited Objection of the Roman Catholic Archbishop of Boston, a Corporation Sole, to the Debtors' Proposed Sales of the Massachusetts Hospitals Free and Clear of Liens and Liabilities (Docket No. 2278)
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- P. Reservation of Rights and Limited Objection of The Nurses & Local 813 IBT Retirement Plan to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing (Docket No. 2242) and Notice of

Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2260) (Docket No. 2281)

- Q. Reservation of Rights of Medical Properties Trust, Inc. and the Master Lease II Lessors Regarding Notices of Sale for Massachusetts Hospitals (Docket No. 2282)
- R. Reservation of Rights and Limited Objection of the 1199 SEIU United Healthcare Workers East to: Notice of (I) Designation of Successful Bids; (II) Proposed Sale Orders; (III) Scheduling of Sale Hearing With Respect To (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, (C) St. Anne's Hospital and (D) Morton Hospital; and (IV) Reservation of Rights To Seek Approval of Sale of St. Elizabeth's Medical Center and Good Samaritan Medical Center at Sale Hearing and Notice of Designation of Successful Bid and Proposed Sale Order For St. Elizabeth's Medical Center and Good Samaritan Medical Center (Docket No. 2283)
- S. United States' (IRS) Limited Objection to Sale Order and Asset Purchased Agreements for (I) Holy Family Methuen Hospital, (II) Holy Family Haverhill Hospital, (III) St. Anne's Hospital and (IV) Morton Hospital (Docket No. 2284)

Additional Adjourned Responses (Cure and Adequate Assurance Objections)

- A. See **Annex A**

Related Documents:

- A. Declaration of Toby King in Support of Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 426)
- B. Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (C) Assumption and Assignment Procedures and Form and Manner of Notice of Assumption and Assignment; (II) Authorizing Designation of Stalking Horse Bidders; (III) Scheduling Auctions and Sale Hearings; and (IV) Granting Related Relief (Docket No. 626)

- C. Notice of Sale, Global Bidding Procedures, Auction, and Sale Hearing (Docket No. 689)
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- N. Declaration of Toby King in Support of (I) the Sales of (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, and (C) St. Elizabeth's Medical Center, Free and Clear of Liens and Liabilities; and (II) Granting Related Relief (Docket No. 2261)
- O. Declaration of James Moloney in Support of (I) the Sales of (A) Morton Hospital, (B) Saint Anne's Hospital, and (C) Good Samaritan Medical Center, Free and Clear of Liens, Claims, Encumbrances, and Interests; and (II) Granting Related Relief (Docket No. 2262)

- P. Declaration of John R. Castellano in Support of the Sales of Massachusetts Hospitals Free and Clear of Liens and Liabilities; and Granting Related Relief (Docket No. 2263)
- Q. Debtors' Witness and Exhibit List for Hearing on September 4, 2024 (Docket No. 2272)

II. EMERGENCY MATTER

4. **Emergency Motion of Debtors for Entry of an Order (I) Approving Additional Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals; and (II) Granting Related Relief (Docket No. 2286)**

Status: This matter is going forward on an emergency basis.

Related Documents:

- A. Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief (Docket No. 1711)
- B. Declaration of John R. Castellano in Support of Emergency Motions of Debtors for Entry of Orders (I) Approving (A) Funding From the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; (II) Authorizing Rejection of Master Lease II Agreements in Connection With Planned Transition and Sale of Massachusetts Hospitals to New Operators; and (III) Granting Related Relief (Docket No. 1713)
- C. Order Approving Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals and Granting Related Relief (Docket No. 1855)
- D. Declaration of Toby King in Support of (I) the Sales of (A) Holy Family Methuen Hospital, (B) Holy Family Haverhill Hospital, and (C) St. Elizabeth's Medical Center, Free and Clear of Liens and Liabilities; and (II) Granting Related Relief (Docket No. 2261)
- E. Declaration of James Moloney in Support of (I) the Sales of (A) Morton Hospital, (B) Saint Anne's Hospital, and (C) Good Samaritan Medical Center, Free and Clear of Liens, Claims, Encumbrances, and Interests; and (II) Granting Related Relief (Docket No. 2262)

- F. Declaration of John R. Castellano in Support of the Sales of Massachusetts Hospitals Free and Clear of Liens and Liabilities; and Granting Related Relief (Docket No. 2263)
- G. Notice of Intent to Adduce Testimony From a Remote Location by Telephone and Audio Technology (Docket No. 2246)
- H. Debtors' Witness and Exhibit List for Hearing on September 4, 2024 (Docket No. 2272)

Dated: September 3, 2024
Houston, Texas

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Certificate of Service

I hereby certify that on September 3, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Clifford W. Carlson
Clifford W. Carlson

Annex A

Party	Docket No.	Pleading	Type of Objection	Status
Cintas Corporation	898 1689	Objection	Cure	Adjourned
Plymouth Rock Lithotripsy, LLC	899 2290	Objection	Cure	Adjourned
Brighton Elks	901 1942	Objection	Cure	Adjourned
Southern New England Surgery Center, LLC	902 1673 2275	Objection	Cure	Adjourned
Cigna Health and Life Insurance Company	904 1579 1703 1724	Objection	Cure	Adjourned
GA HC REIT II Hope MOB, LLC	905 1670	Objection	Cure	Adjourned
Mass General Brigham Incorporated	912	Objection	Cure	Adjourned
PaceMate, LLC	932	Objection	Cure	Adjourned
Constitution Surgery Alliance, LLC	935	Objection	Cure	Adjourned
University Orthopedics, Inc.	936	Objection	Cure	Adjourned
Dana-Farber Cancer Institute, Inc.	941	Objection	Cure	Adjourned
CARCO Group, Inc.	942 1179	Objection	Cure	Adjourned
InCare LLC	943	Objection	Cure	Adjourned
Welltower OM Group, LLC	949 988	Objection	Cure	Adjourned
Intelligent Medical Objects, Inc.	952	Objection	Cure	Adjourned
Medshape, Inc.	955	Objection	Cure	Adjourned
Whelan Janitorial Massachusetts, LLC	954 1150	Objection	Cure	Adjourned
Blue Cross Blue Shield of MA	964	Objection	Cure	Adjourned
Healthcare Realty Trust Incorporated	965 1821	Objection	Cure	Adjourned
DDK Realty Trust	991 1149	Objection	Cure	Adjourned
Delta Locum Tenens	996 1700	Objection	Cure	Adjourned
Gibbflin LLC	1026 1795	Objection	Cure	Adjourned
Dr. Phoebe Olhava	1107	Objection	Cure	Adjourned
RFC MFC 788 Boston Road, LLC	1160	Objection	Cure	Adjourned

Party	Docket No.	Pleading	Type of Objection	Status
Access Information Management Corporation	1081	Objection	Cure	Adjourned
Hawthorn Medical Associates, LLC	1082	Objection	Cure	Adjourned
Comcast Cable Communications Management, LLC	1086 1748	Objection	Cure	Adjourned
AthenaHealth, Inc.	1090	Objection	Cure	Adjourned
Elevance Health Companies, Inc.	1108 1742	Objection	Cure	Adjourned
Phillips Medical Capital	1152	Objection	Cure	Adjourned
Miller River Development, LLC	1156	Objection	Cure	Adjourned
Spyglass Hill Property, LLC	1168 1698	Objection	Cure	Adjourned
UnitedHealthcare Insurance Company	1577	Objection	Cure	Adjourned
RMR OPFCP LLC	1601	Objection	Cure	Adjourned
Edwards Lifesciences LLC	1611	Objection	Cure	Adjourned
Stonebriar Commercial Finance LLC	1647	Objection	Cure	Adjourned
203 Turnpike Street, LLC	1729	Objection	Cure	Adjourned
Dr. Ekkehard Kasper	1776	Objection	Cure	Adjourned
Dext Capital, LLC	1788	Objection	Cure	Adjourned
Dr. Kirk E. Maes	1806	Objection	Cure	Adjourned