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ATTORNEYS FOR THE DEBTORS
AND DEBTORS IN POSSESSION

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|---|---|--|
| ----- | § | |
| In re: | § | Chapter 11 |
| | § | |
| ADPT DFW HOLDINGS LLC, <i>et al.</i> , ¹ | § | Case No. 17-31432 |
| | § | |
| Debtors. | § | Jointly Administered under Case No. 17-31432 |
| ----- | § | |

**DEBTORS' EMERGENCY MOTION TO QUASH DEPOSITION
NOTICES AND MOTION TO COMPEL ANSWERS TO INTERROGATORIES**

[Relates to Dkt. No. 484]

COME NOW the above-captioned debtors and debtors in possession (collectively, the "Debtors") and hereby file this Emergency Motion (the "Emergency Motion") to Quash Deposition Notices and Motion to Compel Answers to Interrogatories, and in support thereof respectfully state as follows:

I. BACKGROUND

1. On July 27, 2017, the Official Committee of Equity Security Holders of Adeptus Health Inc. (the "Equity Committee") filed its *Motion of the Official Committee of Equity Security Holders of Adeptus Health Inc. For an Order (I) Appointing a Trustee For the Chapter 11 Estate*

¹ The Debtors include all of the affiliated entities that are listed on the Appendix, attached hereto.

of Adeptus Health Inc. Pursuant to Bankruptcy Code Section 1104(a); or, Alternatively, (II) Appointing an Examiner Pursuant to Bankruptcy Code Section 1104(c) and Terminating the Debtors' Exclusivity Period Pursuant to Bankruptcy Code Section 1121(d) (Dkt. No. 484) (the "Trustee Motion").

2. On August 11, 2017, Debtors served their First Set of Interrogatories in Connection with Docket No. 484 (the "Interrogatories"), which included 19 interrogatories narrowly tailored to the discover the bases for the allegations made in the Trustee Motion. *See Exhibit A.*

3. On August 18, the Equity Committee served its Objections and Responses to the Interrogatories. *See Exhibit B.* Those purported "responses," however, were not actually responses, but rather, were a litany of repetitive objections. *See Id.* Not a single Interrogatory was answered. *See Id.* Instead, every single request was objected to, *inter alia*, on the basis that (i) the Equity Committee's investigation is not complete, (ii) the information is not under the control of the Equity Committee, or (iii) even when the interrogatory quotes the Trustee Motion, the Interrogatories somehow were not reasonably calculated to lead to the discovery of admissible evidence.

4. Within hours after being served with the responses, counsel for Debtors emailed counsel for the Equity Committee regarding the utter lack of response to the Interrogatories and requested that the Equity Committee amend the responses by Monday, August 21 ahead of depositions scheduled for Tuesday, August 22. **Exhibit C.** Receiving no response, counsel for Debtors again emailed counsel for the Equity Committee on August 22 requesting amended responses. **Exhibit D.** As of the filing of this Emergency Motion, however, counsel for the Equity Committee has still not responded.

5. On Monday, August 21, 2017, the Equity Committee served its Second Amended Notice of Deposition of Gregory W. Scott (**Exhibit E**) and Second Amended Notice of Deposition of Debtors (**Exhibit F**).

II. ARGUMENT

6. The Debtors properly served its narrowly tailored Interrogatories on the Equity Committee but has received not a single substantive response to any of the 19 interrogatories contained therein. The Interrogatories were in direct response to the Trustee Motion filed by the Equity Committee and are necessary to understand the bases for the allegations contained in the Trustee Motion. Without substantive responses to the Interrogatories, Debtors are unable to understand the allegations and are therefore unable to proceed with the noticed depositions.

7. The purported “responses” were not served in good faith. Either the objections were served improperly as a delay tactic, or worse, they are factually accurate and therefore troubling. Assuming they were merely served for delay, then the Equity Committee should not be rewarded for such dilatory conduct by being allowed to ambush the witnesses at depositions, and the depositions should be moved until after the Equity Committee has provided substantive responses. If, on the other hand, the responses are accurate because the factual contentions in the Trustee Motion have no evidentiary support (notably little if any contentions are made on information and belief or suggest a need for further investigation), then the depositions should be quashed altogether.

III. CONCLUSION

WHEREFORE, the Debtors respectfully request that the Court grant this *Emergency Motion to Quash Deposition Notices and Motion to Compel Answers to Interrogatories* and quash the attached deposition notices and compel the Equity Committee to provide substantive answers to the Interrogatories. Debtors further request that this Court grant such other and further relief to which the Debtors are entitled, at law or in equity.

Dated: August 22, 2017
Dallas, Texas

NORTON ROSE FULBRIGHT US LLP

By: /s/ Liz Boydston

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*Attorneys for the Debtors
and Debtors in Possession*

CERTIFICATE OF CONFERENCE

Pursuant to L.B.R. 9007-1(f), the undersigned counsel hereby certifies that the Debtors have attempted to confer via email with counsel for the Equity Committee on August 18, 2017 and August 22, 2017, but were unable to reach agreement. Accordingly, the Debtors understand that the Equity Committee opposes the relief contained in the Emergency Motion.

/s/ Liz Boydston

Liz Boydston

Appendix
(Sorted Alphabetically)

| # | Debtor Name | Case No. | EIN |
|-----|--|----------|------------|
| 1. | Adeptus Health Colorado Holdings LLC | 17-31448 | 30-0857912 |
| 2. | Adeptus Health Inc. | 17-31434 | 46-5037387 |
| 3. | Adeptus Health LLC | 17-31435 | 32-0432716 |
| 4. | Adeptus Health Management LLC | 17-31455 | 32-0448472 |
| 5. | Adeptus Health Phoenix Holdings LLC | 17-31461 | 35-2487075 |
| 6. | Adeptus Health Ventures LLC | 17-31466 | 36-4802997 |
| 7. | ADPT Columbus Holdings LLC | 17-31471 | 36-4835265 |
| 8. | ADPT DFW Holdings LLC | 17-31432 | 30-0857947 |
| 9. | ADPT Houston Holdings LLC | 17-31479 | 30-0857977 |
| 10. | ADPT New Orleans Holdings LLC | 17-31486 | 32-0479313 |
| 11. | ADPT New Orleans Management LLC | 17-31493 | Pending |
| 12. | ADPT-AZ MPT Holdings LLC | 17-31497 | 61-1772047 |
| 13. | ADPT-AZ RE Holdings LLC | 17-31502 | 47-5241979 |
| 14. | ADPT-CO MPT Holdings LLC | 17-31508 | 47-3512571 |
| 15. | ADPT-CO RE Holdings LLC | 17-31512 | 47-3565144 |
| 16. | ADPT-Columbus MPT Holdings LLC | 17-31519 | Pending |
| 17. | ADPT-Columbus RE Holdings LLC | 17-31523 | Pending |
| 18. | ADPT-DFW MPT Holdings LLC | 17-31527 | 81-0772445 |
| 19. | ADPT-DFW RE Holdings LLC | 17-31532 | 81-0785981 |
| 20. | ADPT-Houston MPT Holdings LLC | 17-31533 | 30-0914017 |
| 21. | ADPT-Houston RE Holdings LLC | 17-31536 | 61-1781468 |
| 22. | ADPT-LA MPT Holdings LLC | 17-31542 | 81-0752643 |
| 23. | ADPT-LA RE Holdings LLC | 17-31545 | 81-0758384 |
| 24. | AJNH Medical Center LLC | 17-31548 | 36-4729524 |
| 25. | Alamo Heights SA Medical Center LLC | 17-31553 | 35-2547715 |
| 26. | Algiers Medical Center LLC | 17-31556 | 32-0455775 |
| 27. | Alvin Medical Center LLC | 17-31561 | 90-1008817 |
| 28. | Anthem Medical Center LLC | 17-31564 | 37-1740119 |
| 29. | Antoine Medical Center LLC | 17-31440 | 35-2537322 |
| 30. | Arizona General ER LLC | 17-31444 | 90-1025598 |
| 31. | Atascocita 1960 Medical Center LLC | 17-31449 | 36-4780687 |
| 32. | Austin Brodie Medical Center LLC | 17-31454 | 61-1713294 |
| 33. | Baytown Medical Center LLC | 17-31456 | 30-0840445 |
| 34. | Bella Terra Medical Center LLC | 17-31459 | 80-0957867 |
| 35. | Bender's Landing Medical Center LLC | 17-31468 | 37-1752156 |
| 36. | Blacklick Woods Medical Center LLC | 17-31475 | 30-0805532 |
| 37. | Briar Forest-Eldridge Medical Center LLC | 17-31482 | 35-2481862 |
| 38. | Broad Wagoner Medical Center LLC | 17-31488 | 35-2492252 |
| 39. | Brushy Creek Medical Center LLC | 17-31494 | 38-3923792 |
| 40. | Camelback 83rd Medical Center LLC | 17-31498 | 38-3945993 |
| 41. | Cedar Park Lakeline Medical Center LLC | 17-31505 | 35-2493773 |
| 42. | Centennial Medical Center LLC | 17-31509 | 32-0436930 |
| 43. | Center Street DP Medical Center LLC | 17-31516 | 35-2453223 |
| 44. | Chandler Germann Medical Center LLC | 17-31521 | 80-0938469 |
| 45. | Chandler Heights Medical Center LLC | 17-31525 | 32-0456525 |

| # | Debtor Name | Case No. | EIN |
|-----|---|----------|------------|
| 46. | Cinco Ranch Medical Center LLC | 17-31529 | 61-1744313 |
| 47. | Colonial Lakes Medical Center LLC | 17-31535 | 90-1004044 |
| 48. | Colorado General Hospital LLC | 17-31539 | 35-2506314 |
| 49. | Conroe Medical Center LLC | 17-31544 | 37-1743660 |
| 50. | Converse Medical Center LLC | 17-31551 | 30-0820305 |
| 51. | Copperwood Medical Center LLC | 17-31554 | 84-1697403 |
| 52. | Creekside Forest Medical Center LLC | 17-31557 | 36-4781064 |
| 53. | Culebra-Tezel Medical Center LLC | 17-31559 | 90-1020838 |
| 54. | De Zavala Medical Center LLC | 17-31560 | 30-0879734 |
| 55. | Dublin Medical Center LLC | 17-31563 | 80-0965351 |
| 56. | Eagles Nest Medical Center LLC | 17-31565 | 04-3847518 |
| 57. | East Mesa Medical Center LLC | 17-31437 | 90-1033851 |
| 58. | East Pflugerville Medical Center LLC | 17-31439 | 90-1023315 |
| 59. | East Riverside Medical Center LLC | 17-31442 | 38-3973259 |
| 60. | ECC Management, LLC | 17-31443 | 16-1711879 |
| 61. | FCER Management, LLC | 17-31447 | 11-3798239 |
| 62. | First Choice ER, LLC | 17-31436 | 27-5348156 |
| 63. | First Texas Hospital Cy-Fair LLC | 17-31451 | 47-3480091 |
| 64. | Four Points Medical Center LLC | 17-31464 | 38-3938637 |
| 65. | Friendswood Medical Center LLC | 17-31469 | 38-3916132 |
| 66. | FTH Houston Partners LLC | 17-31474 | 47-3466871 |
| 67. | Garland Centerville Medical Center LLC | 17-31477 | 35-2537960 |
| 68. | Gilbert Medical Center LLC | 17-31481 | 80-0940827 |
| 69. | Gleannloch Farms Medical Center LLC | 17-31485 | 35-2481256 |
| 70. | Glendale Medical Center LLC | 17-31489 | 90-1012820 |
| 71. | Goodyear Medical Center LLC | 17-31490 | 90-1007336 |
| 72. | Greenville Stacy Medical Center LLC | 17-31492 | 38-3926926 |
| 73. | Guadalupe River Medical Center LLC | 17-31496 | 35-2514826 |
| 74. | Hampden Tower Medical Center LLC | 17-31499 | 38-3928757 |
| 75. | Helotes Medical Center LLC | 17-31501 | 36-4782313 |
| 76. | Hilliard Medical Center LLC | 17-31504 | 35-2491198 |
| 77. | Houston 9520 Jones Medical Center LLC | 17-31507 | 32-0432459 |
| 78. | Houston FM 1960 Medical Center LLC | 17-31511 | 37-1783329 |
| 79. | Katy ER Center LLC | 17-31514 | 45-2583773 |
| 80. | Keller Medical Center LLC | 17-31517 | 61-1736669 |
| 81. | Kingwood Medical Center LLC | 17-31520 | 80-0684495 |
| 82. | Kuykendahl Medical Center LLC | 17-31524 | 34-2028269 |
| 83. | La Porte Medical Center LLC | 17-31526 | 80-0927953 |
| 84. | Lakewood Forest Medical Center LLC | 17-31530 | 90-1013791 |
| 85. | League City Medical Center LLC | 17-31438 | 36-4766358 |
| 86. | Legacy Trails Medical Center LLC | 17-31441 | 61-1744649 |
| 87. | Lewis Center Medical Center LLC | 17-31445 | 32-0431791 |
| 88. | Litchfield Park Medical Center LLC | 17-31446 | 36-4801379 |
| 89. | Louetta Medical Center LLC | 17-31450 | 74-3178584 |
| 90. | Marrero Medical Center LLC | 17-31453 | 61-1753468 |
| 91. | Meadowbrook Heights Medical Center LLC | 17-31457 | 32-0448039 |
| 92. | Medical Center of Crosby Lynchburg LLC | 17-31458 | 38-3922039 |
| 93. | Medical Center of Spring Rayford Richards LLC | 17-31462 | 37-1747613 |

| # | Debtor Name | Case No. | EIN |
|------|---|----------|------------|
| 94. | Mesa Tierra Medical Center LLC | 17-31465 | 35-2523890 |
| 95. | Midlothian Medical Center LLC | 17-31470 | 30-0802928 |
| 96. | Mountain Park Ranch Medical Center LLC | 17-31473 | 38-3939092 |
| 97. | National Medical Professionals of Arizona LLC | 17-31478 | 37-1757007 |
| 98. | National Medical Professionals of Ohio LLC | 17-31483 | 30-0829176 |
| 99. | New Orleans East Medical Center LLC | 17-31510 | 61-1753435 |
| 100. | Northwest Harris County Medical Center LLC | 17-31538 | 36-4781722 |
| 101. | Ohio General ER LLC | 17-31540 | 38-3918055 |
| 102. | Ohio General Hospital LLC | 17-31547 | 80-0956267 |
| 103. | OpFree Licensing LP | 17-31549 | 01-0831027 |
| 104. | OpFree RE Investments, Ltd. | 17-31558 | 06-1740727 |
| 105. | OpFree, LLC | 17-31562 | 34-2028263 |
| 106. | Pearland 518 Medical Center LLC | 17-31566 | 90-1025398 |
| 107. | Pearland Parkway Medical Center LLC | 17-31567 | 51-0576704 |
| 108. | Pearland Sunrise Medical Center LLC | 17-31568 | 90-1001726 |
| 109. | Pflugerville Medical Center LLC | 17-31569 | 45-2552050 |
| 110. | Potranco Medical Center LLC | 17-31570 | 80-0966887 |
| 111. | Provinces Medical Center LLC | 17-31571 | 80-0967881 |
| 112. | Queen Creek Medical Center LLC | 17-31572 | 32-0457346 |
| 113. | Rosenberg Medical Center LLC | 17-31452 | 80-0964882 |
| 114. | Roy Richard Medical Center LLC | 17-31460 | 35-2491802 |
| 115. | San Antonio Nacogdoches Medical Center LLC | 17-31463 | 80-0937326 |
| 116. | San Tan Valley Medical Center LLC | 17-31467 | 36-4801184 |
| 117. | Seguin Foster Medical Center LLC | 17-31472 | 35-2532650 |
| 118. | Sienna Plantation Medical Center LLC | 17-31476 | 90-1009094 |
| 119. | South Bend Medical Center LLC | 17-31480 | 61-1770288 |
| 120. | South Carrier Medical Center LLC | 17-31484 | 32-0429602 |
| 121. | South Green Oaks Medical Center LLC | 17-31487 | 90-1012518 |
| 122. | Spanish Oaks Medical Center LLC | 17-31491 | 90-1012951 |
| 123. | Spring 2920 Medical Center LLC | 17-31495 | 36-4776092 |
| 124. | Spring Green Medical Center LLC | 17-31500 | Pending |
| 125. | SSHMedical Center LLC | 17-31503 | 77-0666943 |
| 126. | Sterling Ridge Medical Center II LLC | 17-31506 | 32-0439505 |
| 127. | Sterling Ridge Medical Center LLC | 17-31513 | 16-1711883 |
| 128. | Summerwood Medical Center LLC | 17-31515 | 30-0802964 |
| 129. | Surprise Medical Center LLC | 17-31518 | 90-1012038 |
| 130. | SW Chandler Medical Center LLC | 17-31522 | 90-1032288 |
| 131. | Sycamore School Medical Center LLC | 17-31528 | 35-2494277 |
| 132. | Tempe McClintock Baseline Medical Center LLC | 17-31531 | 38-3923748 |
| 133. | Tempe Rural-Baseline Medical Center LLC | 17-31534 | 30-0852296 |
| 134. | Texas Regional Hospital LLC | 17-31537 | 37-1753820 |
| 135. | Victory Lakes Medical Center LLC | 17-31541 | 37-1751372 |
| 136. | Wadsworth-Belleview Medical Center LLC | 17-31543 | 35-2486458 |
| 137. | Waterside Medical Center LLC | 17-31546 | 36-4767886 |
| 138. | White Settlement Medical Center LLC | 17-31550 | 38-3970573 |
| 139. | Wilderness-Hardy Oak Medical Center LLC | 17-31552 | 80-0954867 |
| 140. | William Cannon Medical Center LLC | 17-31555 | 35-2493839 |

(Sorted Numerically By Case Number)

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| 1. | ADPT DFW Holdings LLC | 17-31432 | 30-0857947 |
| 2. | Adeptus Health Inc. | 17-31434 | 46-5037387 |
| 3. | Adeptus Health LLC | 17-31435 | 32-0432716 |
| 4. | First Choice ER, LLC | 17-31436 | 27-5348156 |
| 5. | East Mesa Medical Center LLC | 17-31437 | 90-1033851 |
| 6. | League City Medical Center LLC | 17-31438 | 36-4766358 |
| 7. | East Pflugerville Medical Center LLC | 17-31439 | 90-1023315 |
| 8. | Antoine Medical Center LLC | 17-31440 | 35-2537322 |
| 9. | Legacy Trails Medical Center LLC | 17-31441 | 61-1744649 |
| 10. | East Riverside Medical Center LLC | 17-31442 | 38-3973259 |
| 11. | ECC Management, LLC | 17-31443 | 16-1711879 |
| 12. | Arizona General ER LLC | 17-31444 | 90-1025598 |
| 13. | Lewis Center Medical Center LLC | 17-31445 | 32-0431791 |
| 14. | Litchfield Park Medical Center LLC | 17-31446 | 36-4801379 |
| 15. | FCER Management, LLC | 17-31447 | 11-3798239 |
| 16. | Adeptus Health Colorado Holdings LLC | 17-31448 | 30-0857912 |
| 17. | Atascocita 1960 Medical Center LLC | 17-31449 | 36-4780687 |
| 18. | Louetta Medical Center LLC | 17-31450 | 74-3178584 |
| 19. | First Texas Hospital Cy-Fair LLC | 17-31451 | 47-3480091 |
| 20. | Rosenberg Medical Center LLC | 17-31452 | 80-0964882 |
| 21. | Marrero Medical Center LLC | 17-31453 | 61-1753468 |
| 22. | Austin Brodie Medical Center LLC | 17-31454 | 61-1713294 |
| 23. | Adeptus Health Management LLC | 17-31455 | 32-0448472 |
| 24. | Baytown Medical Center LLC | 17-31456 | 30-0840445 |
| 25. | Meadowbrook Heights Medical Center LLC | 17-31457 | 32-0448039 |
| 26. | Medical Center of Crosby Lynchburg LLC | 17-31458 | 38-3922039 |
| 27. | Bella Terra Medical Center LLC | 17-31459 | 80-0957867 |
| 28. | Roy Richard Medical Center LLC | 17-31460 | 35-2491802 |
| 29. | Adeptus Health Phoenix Holdings LLC | 17-31461 | 35-2487075 |
| 30. | Medical Center of Spring Rayford Richards LLC | 17-31462 | 37-1747613 |
| 31. | San Antonio Nacogdoches Medical Center LLC | 17-31463 | 80-0937326 |
| 32. | Four Points Medical Center LLC | 17-31464 | 38-3938637 |
| 33. | Mesa Tierra Medical Center LLC | 17-31465 | 35-2523890 |
| 34. | Adeptus Health Ventures LLC | 17-31466 | 36-4802997 |
| 35. | San Tan Valley Medical Center LLC | 17-31467 | 36-4801184 |
| 36. | Bender's Landing Medical Center LLC | 17-31468 | 37-1752156 |
| 37. | Friendswood Medical Center LLC | 17-31469 | 38-3916132 |
| 38. | Midlothian Medical Center LLC | 17-31470 | 30-0802928 |
| 39. | ADPT Columbus Holdings LLC | 17-31471 | 36-4835265 |
| 40. | Seguin Foster Medical Center LLC | 17-31472 | 35-2532650 |
| 41. | Mountain Park Ranch Medical Center LLC | 17-31473 | 38-3939092 |
| 42. | FTH Houston Partners LLC | 17-31474 | 47-3466871 |
| 43. | Blacklick Woods Medical Center LLC | 17-31475 | 30-0805532 |
| 44. | Sienna Plantation Medical Center LLC | 17-31476 | 90-1009094 |
| 45. | Garland Centerville Medical Center LLC | 17-31477 | 35-2537960 |
| 46. | National Medical Professionals of Arizona LLC | 17-31478 | 37-1757007 |

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| 47. | ADPT Houston Holdings LLC | 17-31479 | 30-0857977 |
| 48. | South Bend Medical Center LLC | 17-31480 | 61-1770288 |
| 49. | Gilbert Medical Center LLC | 17-31481 | 80-0940827 |
| 50. | Briar Forest-Eldridge Medical Center LLC | 17-31482 | 35-2481862 |
| 51. | National Medical Professionals of Ohio LLC | 17-31483 | 30-0829176 |
| 52. | South Carrier Medical Center LLC | 17-31484 | 32-0429602 |
| 53. | Gleannloch Farms Medical Center LLC | 17-31485 | 35-2481256 |
| 54. | ADPT New Orleans Holdings LLC | 17-31486 | 32-0479313 |
| 55. | South Green Oaks Medical Center LLC | 17-31487 | 90-1012518 |
| 56. | Broad Wagoner Medical Center LLC | 17-31488 | 35-2492252 |
| 57. | Glendale Medical Center LLC | 17-31489 | 90-1012820 |
| 58. | Goodyear Medical Center LLC | 17-31490 | 90-1007336 |
| 59. | Spanish Oaks Medical Center LLC | 17-31491 | 90-1012951 |
| 60. | Greenville Stacy Medical Center LLC | 17-31492 | 38-3926926 |
| 61. | ADPT New Orleans Management LLC | 17-31493 | Pending |
| 62. | Brushy Creek Medical Center LLC | 17-31494 | 38-3923792 |
| 63. | Spring 2920 Medical Center LLC | 17-31495 | 36-4776092 |
| 64. | Guadalupe River Medical Center LLC | 17-31496 | 35-2514826 |
| 65. | ADPT-AZ MPT Holdings LLC | 17-31497 | 61-1772047 |
| 66. | Camelback 83rd Medical Center LLC | 17-31498 | 38-3945993 |
| 67. | Hampden Tower Medical Center LLC | 17-31499 | 38-3928757 |
| 68. | Spring Green Medical Center LLC | 17-31500 | Pending |
| 69. | Helotes Medical Center LLC | 17-31501 | 36-4782313 |
| 70. | ADPT-AZ RE Holdings LLC | 17-31502 | 47-5241979 |
| 71. | SSH Medical Center LLC | 17-31503 | 77-0666943 |
| 72. | Hilliard Medical Center LLC | 17-31504 | 35-2491198 |
| 73. | Cedar Park Lakeline Medical Center LLC | 17-31505 | 35-2493773 |
| 74. | Sterling Ridge Medical Center II LLC | 17-31506 | 32-0439505 |
| 75. | Houston 9520 Jones Medical Center LLC | 17-31507 | 32-0432459 |
| 76. | ADPT-CO MPT Holdings LLC | 17-31508 | 47-3512571 |
| 77. | Centennial Medical Center LLC | 17-31509 | 32-0436930 |
| 78. | New Orleans East Medical Center LLC | 17-31510 | 61-1753435 |
| 79. | Houston FM 1960 Medical Center LLC | 17-31511 | 37-1783329 |
| 80. | ADPT-CO RE Holdings LLC | 17-31512 | 47-3565144 |
| 81. | Sterling Ridge Medical Center LLC | 17-31513 | 16-1711883 |
| 82. | Katy ER Center LLC | 17-31514 | 45-2583773 |
| 83. | Summerwood Medical Center LLC | 17-31515 | 30-0802964 |
| 84. | Center Street DP Medical Center LLC | 17-31516 | 35-2453223 |
| 85. | Keller Medical Center LLC | 17-31517 | 61-1736669 |
| 86. | Surprise Medical Center LLC | 17-31518 | 90-1012038 |
| 87. | ADPT-Columbus MPT Holdings LLC | 17-31519 | Pending |
| 88. | Kingwood Medical Center LLC | 17-31520 | 80-0684495 |
| 89. | Chandler Germann Medical Center LLC | 17-31521 | 80-0938469 |
| 90. | SW Chandler Medical Center LLC | 17-31522 | 90-1032288 |
| 91. | ADPT-Columbus RE Holdings LLC | 17-31523 | Pending |
| 92. | Kuykendahl Medical Center LLC | 17-31524 | 34-2028269 |
| 93. | Chandler Heights Medical Center LLC | 17-31525 | 32-0456525 |
| 94. | La Porte Medical Center LLC | 17-31526 | 80-0927953 |

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| 95. | ADPT-DFW MPT Holdings LLC | 17-31527 | 81-0772445 |
| 96. | Sycamore School Medical Center LLC | 17-31528 | 35-2494277 |
| 97. | Cinco Ranch Medical Center LLC | 17-31529 | 61-1744313 |
| 98. | Lakewood Forest Medical Center LLC | 17-31530 | 90-1013791 |
| 99. | Tempe McClintock Baseline Medical Center LLC | 17-31531 | 38-3923748 |
| 100. | ADPT-DFW RE Holdings LLC | 17-31532 | 81-0785981 |
| 101. | ADPT-Houston MPT Holdings LLC | 17-31533 | 30-0914017 |
| 102. | Tempe Rural-Baseline Medical Center LLC | 17-31534 | 30-0852296 |
| 103. | Colonial Lakes Medical Center LLC | 17-31535 | 90-1004044 |
| 104. | ADPT-Houston RE Holdings LLC | 17-31536 | 61-1781468 |
| 105. | Texas Regional Hospital LLC | 17-31537 | 37-1753820 |
| 106. | Northwest Harris County Medical Center LLC | 17-31538 | 36-4781722 |
| 107. | Colorado General Hospital LLC | 17-31539 | 35-2506314 |
| 108. | Ohio General ER LLC | 17-31540 | 38-3918055 |
| 109. | Victory Lakes Medical Center LLC | 17-31541 | 37-1751372 |
| 110. | ADPT-LA MPT Holdings LLC | 17-31542 | 81-0752643 |
| 111. | Wadsworth-Belleview Medical Center LLC | 17-31543 | 35-2486458 |
| 112. | Conroe Medical Center LLC | 17-31544 | 37-1743660 |
| 113. | ADPT-LA RE Holdings LLC | 17-31545 | 81-0758384 |
| 114. | Waterside Medical Center LLC | 17-31546 | 36-4767886 |
| 115. | Ohio General Hospital LLC | 17-31547 | 80-0956267 |
| 116. | AJNH Medical Center LLC | 17-31548 | 36-4729524 |
| 117. | OpFree Licensing LP | 17-31549 | 01-0831027 |
| 118. | White Settlement Medical Center LLC | 17-31550 | 38-3970573 |
| 119. | Converse Medical Center LLC | 17-31551 | 30-0820305 |
| 120. | Wilderness-Hardy Oak Medical Center LLC | 17-31552 | 80-0954867 |
| 121. | Alamo Heights SA Medical Center LLC | 17-31553 | 35-2547715 |
| 122. | Copperwood Medical Center LLC | 17-31554 | 84-1697403 |
| 123. | William Cannon Medical Center LLC | 17-31555 | 35-2493839 |
| 124. | Algiers Medical Center LLC | 17-31556 | 32-0455775 |
| 125. | Creekside Forest Medical Center LLC | 17-31557 | 36-4781064 |
| 126. | OpFree RE Investments, Ltd. | 17-31558 | 06-1740727 |
| 127. | Culebra-Tezel Medical Center LLC | 17-31559 | 90-1020838 |
| 128. | De Zavala Medical Center LLC | 17-31560 | 30-0879734 |
| 129. | Alvin Medical Center LLC | 17-31561 | 90-1008817 |
| 130. | OpFree, LLC | 17-31562 | 34-2028263 |
| 131. | Dublin Medical Center LLC | 17-31563 | 80-0965351 |
| 132. | Anthem Medical Center LLC | 17-31564 | 37-1740119 |
| 133. | Eagles Nest Medical Center LLC | 17-31565 | 04-3847518 |
| 134. | Pearland 518 Medical Center LLC | 17-31566 | 90-1025398 |
| 135. | Pearland Parkway Medical Center LLC | 17-31567 | 51-0576704 |
| 136. | Pearland Sunrise Medical Center LLC | 17-31568 | 90-1001726 |
| 137. | Pflugerville Medical Center LLC | 17-31569 | 45-2552050 |
| 138. | Potranco Medical Center LLC | 17-31570 | 80-0966887 |
| 139. | Provinces Medical Center LLC | 17-31571 | 80-0967881 |
| 140. | Queen Creek Medical Center LLC | 17-31572 | 32-0457346 |

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*Attorneys for the Debtors
and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|-------------------------|
| In re: | § | Chapter 11 |
| | § | |
| ADPT DFW HOLDINGS LLC, <i>et al.</i> , | § | Case No. 17-31432 (SGJ) |
| | § | |
| Debtors. | § | Jointly Administered |
| | § | Under Case No. 17-31432 |

**DEBTORS’ FIRST SET OF INTERROGATORIES
IN CONNECTION WITH DOCKET NO. 484, THE TRUSTEE MOTION**

PLEASE TAKE NOTICE that, pursuant to Rule 33 of the Federal Rules of Civil Procedure, made applicable herein by Rule 7033 of the Federal Rules of Bankruptcy Procedure, the above-captioned debtors and debtors in possession hereby request that the Official Committee of Equity Security Holders of Adeptus Health, Inc. respond in writing and under oath to the Debtors’ First Set of Interrogatories in Connection With the Trustee Motion (collectively, the “**Interrogatories**” and each, an “**Interrogatory**”) by August 18, 2017, or any date mutually agreed upon by the Parties after a meet and confer.

INSTRUCTIONS

1. Each Interrogatory shall be answered completely, separately and fully. If You (defined below) are unable to answer any Interrogatory in full, after exercising due diligence to secure the requested information, so state, and explain why the Interrogatory cannot be answered in full.

2. The terms “describe” and “state” mean to set forth fully and unambiguously every fact relevant to the subject of an Interrogatory, of which You have knowledge or information.

3. The term “including” shall be construed as including but not limited to.

4. These Interrogatories are deemed to be continuing in nature as required by Federal Rule 26(e). If You become aware, in light of additional information or otherwise, that Your responses are incomplete or incorrect, You shall supplement or correct Your responses.

5. If You object to any Interrogatory or portion thereof on the basis of a claim of attorney-client privilege, the work product doctrine, or any other claim of privilege or immunity, You must furnish a written statement setting forth the information required by Federal Rule of Civil Procedure 26(b)(5) made applicable by Federal Rule of Bankruptcy Procedure 7026.

6. Where a term or phrase defined herein is not capitalized as set forth in the “Definitions” section below, such term or phrase shall nonetheless have the definition ascribed to it in the “Definitions” section.

7. If You object to any particular portion of any Interrogatory herein, the objection shall state with specificity all grounds for such objection. No part of any Interrogatory shall be left unanswered because an objection is made to any other part.

8. Any documents or things produced in response to an Interrogatory should be segregated and identified by the Interrogatory to which it is primarily responsive or produced.

9. If, in responding to the Interrogatories, You claim any ambiguity in interpreting an Interrogatory or a definition or instruction applicable thereto, such claim shall not be utilized by You as a basis for refusing to respond, but You shall set forth as part of Your response to such Interrogatory, the language deemed to be ambiguous and the interpretation chosen to be used in responding to the Interrogatory.

10. In the event that You claim that an Interrogatory is overbroad or unduly burdensome, You are requested to respond to that portion of the Interrogatory which is unobjectionable and specifically identify the respect in which the Interrogatory is allegedly overbroad or unduly burdensome. If Your objection only goes to part of the Interrogatory, answer the Interrogatory to the extent that any such answer does not fall within the scope of Your objection.

11. For purposes of the Interrogatories, terms not specifically defined shall be given their ordinary meanings as You understand them to be used in the trade.

12. The use of a verb in any tense shall be construed as the use of the verb in all other tenses whenever necessary to bring within the scope of the Interrogatories all documents or information that might otherwise be construed outside of their scope.

13. The plural includes the singular, and the singular includes the plural.

14. Although some of the Interrogatories may overlap with other Interrogatories, no Interrogatory should be read as limiting any other Interrogatory.

DEFINITIONS

1. “**And**” and “**or**” both mean “and/or.”
2. “**Any**” or “**All**” both mean “any and all.”
3. “**Bankruptcy Code**” means title 11 of the United States Code, as amended from time to time, as applicable to these Chapter 11 Cases.
4. “**Bankruptcy Court**” means the United States Bankruptcy Court for the Northern District of Texas having jurisdiction over the Chapter 11 Cases and, to the extent of any reference made under Section 157 of Title 28 of the United States Code or the Bankruptcy Court is determined not to have authority to enter a Final Order on an issue, the unit of such District Court having jurisdiction over the Chapter 11 Cases under Section 151 of Title 28 of the United States Code.
5. “**Cause of Action**” or “**Causes of Action**” means any action, claim, cross-claim, third-party claim, cause of action, controversy, demand, right, lien, indemnity, contribution, guaranty, suit, obligation, liability, debt, damage, judgment, account, defense, remedy, offset, power, privilege, license, and franchise of any kind or character whatsoever, known, unknown, contingent or non-contingent, matured or unmatured, suspected or unsuspected, liquidated or unliquidated, disputed or undisputed, foreseen or unforeseen, direct or indirect, choate or inchoate, secured or unsecured, assertable directly or derivatively (including, without limitation, under alter ego theories), whether arising before, on, or after the Petition Date, in contract or in tort, in law or in equity, or pursuant to any other theory of law. For the avoidance of doubt, Cause of Action includes: (a) any right of setoff, counterclaim, or recoupment and any claim for breach of contract or for breach of duties imposed by law or in equity; (b) the right to object to Claims or Interests; (c) any claim pursuant to Section 362 or Chapter 5 of the Bankruptcy Code;

(d) any claim or defense including fraud, mistake, duress, and usury and any other defenses set forth in Section 558 of the Bankruptcy Code; and (e) any claims under any state or foreign law, including, without limitation, any fraudulent transfer or similar claims.

6. “**Chapter 11 Case**” means, with respect to a Debtor, such Debtor’s case under Chapter 11 of the Bankruptcy Code commenced on the Petition Date in the Bankruptcy Court, jointly administered with all other Debtors’ cases under Chapter 11 of the Bankruptcy Code, and styled *In re ADPT DFW Holdings LLC, et al.*, Case No. 17-31432-(SGJ)

7. “**Communication**” or “**Communications**” means the transmittal of information (in the form of facts, ideas, inquiries, electronic mail, correspondence, memoranda, or documents, in writing, orally, verbally, and otherwise).

8. “**Creditors’ Committee**” means the Official Committee of Unsecured Creditors that was appointed in the Chapter 11 Cases on May 1, 2017.

9. “**D&O Claims**” has the meaning ascribed to it in the Disclosure Statement.

10. “**Debtor**” and “**Debtors**” shall have the meanings ascribed to them in the Plan.

11. “**Deerfield**” means Deerfield Management Company, L.P. and its affiliates.

12. “**Describe in detail**” means to state all grounds, bases, facts, locations, and applicable dates (*e.g.*, the dates of any events, incidents, or communications), and identify all Persons involved.

13. “**Directors and Officers**” means each Debtor’s current and former directors and officers.

14. “**Disclosure Statement**” means that certain *Disclosure Statement for Debtors’ First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* filed at

Docket No. 452 in the Chapter 11 Cases, as amended, modified, and supplemented from time to time.¹

15. “**DLA**” means DLA Piper LLP (US).

16. “**Documents**” includes all documents that are within the scope of the Federal Rules of Civil Procedure, and includes all written, recorded, electronic, graphic, or photographic matter, however produced or reproduced, and includes, without limiting the generality of the foregoing, all computer records, photographs, data, drawings, mail, electronic mail, compilations, letters, handwritten notes, field data, factual observations, tests, studies, charts, graphs, opinions, reports, white papers, supporting calculations, memoranda, ledgers, reference materials, journals, minutes, books, drafts, depositions, summaries, statements, transcriptions, telephone slips, expense accounts, time sheets, telegrams, cables, microfilm, prints, publications, recordings, affidavits, bills, receipts, checks, invoices, video tapes, DVDs, compact discs, motion pictures, audio tapes, pamphlets, agreements and contracts.

17. “**Equity Committee**” means the Official Committee of Equity Security Holders of Adeptus Health, Inc. appointed in the Chapter 11 Cases.

18. “**HoldCo**” means Adeptus Health LLC.

19. “**IPO**” has the meaning ascribed to it in the Disclosure Statement.

20. “**July 2015 Offering**” means the secondary offering conducted on July 29, 2015, by PubCo of 2,645,277 shares of Class A common stock, at a price to the public of \$105.00 per share, which generated net proceeds of approximately \$265.9 million, and PubCo’s use of such proceeds to purchase 2,645,277 LLC Units from certain Post-IPO Unit Holders.

¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Disclosure Statement or the Trustee Motion, as applicable.

21. “**June 2016 Offering**” means the secondary offering conducted on June 2, 2016, by PubCo of 1,774,219 shares of Class A common stock, at a price to the public of \$62.00 per share, which generated net proceeds of approximately \$107.4 million, and PubCo’s use of such proceeds PubCo used the net proceeds to purchase 1,774,219 LLC Units from certain Post-IPO Unit Holders.

22. “**LLC Units**” means the limited liability company units of HoldCo.

23. “**Matlin**” means MatlinPatterson Global Opportunities Master Fund L.P. and its affiliates.

24. “**May 2015 Offering**” means the secondary offering conducted on May 11, 2015, by PubCo of 1,572,296 shares of Class A common stock, at a price to the public of \$63.75 per share, which generated net proceeds of approximately \$94.5 million, and PubCo’s use of such proceeds to purchase 1,572,296 LLC Units from certain Post-IPO Unit Holders.

25. “**NOLs**” means the net operating loss identified on PubCo’s Scheduled B filed at Docket No. 9 in the Chapter 11 Cases.

26. “**Norton Rose Fulbright**” means Norton Rose Fulbright US LLP.

27. “**Person**” means any natural person or any business, corporation, company, limited liability company, partnership, legal entity, association, or governmental entity.

28. “**Petition Date**” means April 19, 2017, the date on which the Debtors commenced the Chapter 11 Cases.

29. “**Plan**” means that certain *Debtors’ First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code* filed at Docket No. 451 in the Chapter 11 Cases, including all appendices, exhibits, schedules, and supplements hereto (including, without limitation, any appendices, schedules, and supplements to this Plan included in the Plan

Supplement), as may be amended or modified from time to time in accordance with the Bankruptcy Code and the terms of the Plan.

30. “**Pre-IPO Unit Holders**” has the meaning ascribed to it in the Disclosure Statement.

31. “**Post-IPO Unit Holders**” has the meaning ascribed to it in the Disclosure Statement.

32. “**PubCo**” means Adeptus Health Inc.

33. “**Relating to**” or “**Related**” means relating to, defining, constituting, referring to, containing, embodying, identifying, stating, dealing with, reflecting, or pertaining to.

34. “**Secondary Offerings**” means, collectively, the May 2015 Offering, the July 2015 Offering, and the June 2016 Offering.

35. “**Sterling Parties**” means Sterling Partners and its subsidiaries and affiliates (other than the Debtors), current officers and directors, principals, shareholders, members, partners, managers, employees, and agents.

36. “**Subsidiaries**” means any and all subsidiaries of PubCo.

37. “**Term Sheet**” means that certain term sheet attached as Exhibit A to the Trustee Motion.

38. “**TRA**” means the Tax Receivable Agreement.

39. “**Trustee Motion**” means that certain *Emergency Motion of the Official Committee of Equity Security Holders of Adeptus Health Inc. for an Order (I) Appointing a Trustee for the Chapter 11 Estate of Adeptus Health Inc. Pursuant to Bankruptcy Code Section 1104(a); or, Alternatively, (II) Appointing an Examiner Pursuant to Bankruptcy Code Section*

1104(c) and Terminating the Debtors' Exclusivity Period Pursuant to Bankruptcy Code Section 1121(d) filed at Docket No. 484 in the Chapter 11 Cases.

40. “**Wexford**” means, collectively, Wexford Spectrum Investors, LLC, Debello Investors, LLC, and their respective affiliates.

41. “**You**” or “**Your**” means the Equity Committee, its members (in any capacity), and all of their respective current and former affiliates, officers, directors, employees, representatives, agents, assigns, predecessors, successors, professionals, advisors, or attorneys.

INTERROGATORIES

INTERROGATORY NO. 1:

Identify with particularity any of PubCo’s current or former employees, directors, or officers that have contacted You, that You contacted, or that You have otherwise had Communications with, regarding the JV agreements, allegations and assertions set forth in the Trustee Motion, and/or any other alleged mismanagement of PubCo or any of the Debtors, and any Causes of Action; and, with respect to any Person so identified, describe in detail (i) any and all Communications that You had with, or received from, such Person, including the subject of such Communications and (ii) any Documents and other information that any such Person identified, discussed, shared with, and/or provided to You.

ANSWER:

INTERROGATORY NO. 2:

Identify with particularity every Cause of Action that You contend that PubCo has or may have with respect to the Directors and Officers, the Sterling Parties, Deerfield, DLA, Norton Rose Fulbright, FTI, KPMG, any other alleged insider of a Debtor, and/or any other professional including, without limitation, any Causes of Action referenced in the Trustee Motion. In the response, please indicate, for each Causes of Action You identify, how PubCo suffered damages, who caused those damages, and under which legal theory PubCo is entitled to independently assert those claims.

ANSWER:

INTERROGATORY NO. 3:

Describe in detail the entire factual and legal basis for Your contention that any and all Causes of

Action against PubCo's Directors and Officers, affiliates, insiders, and/or professionals, including any proceeds of such Causes of Action, are the sole property of PubCo.

ANSWER:

INTERROGATORY NO. 4:

Describe in detail whether You contend or believe that (i) PubCo, (ii) any other Debtor, or (iii) any Pre-IPO Unit Holders received any consideration or value in connection with or relating to the IPO and the Secondary Offerings, and, if so, describe in detail any such consideration or value allegedly received.

ANSWER:

INTERROGATORY NO. 5:

State whether You contend or believe that any Subsidiaries or Debtors have or had, directly or indirectly, a legal, equitable, or beneficial interest (including an interest based on any contract, statute, or common law) in any of the D&O Claims (including the proceeds thereof), Causes of Action (including the proceeds thereof) relating to the IPO and Secondary Offerings, any IPO or Secondary Offering proceeds, and/or other property owned or held by PubCo, and describe in detail the grounds for that contention, belief, or other position, and identify with particularity any Subsidiary or Debtor holds such an interest.

ANSWER:

INTERROGATORY NO. 6:

Describe in detail (i) the cost to the Debtors' estates associated with the appointment of a trustee and/or examiner in the Chapter 11 Cases; (ii) the manner in which You calculated the amounts stated in response in subsection (i) of this Interrogatory; and (iii) the entire basis for Your contention that "AHI submits that the cost of appointing a trustee solely for the AHI estate, to protect the interests of AHI, substantially outweigh any costs associated with such appointment."

ANSWER:

INTERROGATORY NO. 7:

Identify all agreements of any of the Debtors “where rejection may not be in the best interests of the Debtors’ estates” and describe, for each agreement identified, what You contend would be in the Debtors’ estates’ best interests, the basis for such contention, and any analysis or calculation relating to such contention.

ANSWER:

INTERROGATORY NO. 8:

Describe in detail the entire basis for Your contention that the Debtors have “historically mismanaged” the joint ventures or any other aspect of their businesses, including Your contention that “[t]he Debtors’ historical mismanagement of the Joint Ventures is continuing unabated post-petition” and what course of action You contend the Debtors should take with respect to each of the Joint Ventures.

ANSWER:

INTERROGATORY NO. 9:

Describe in detail the entire basis for Your contention that PubCo’s board and management are “squandering AHI’s assets for the primary benefit of Deerfield.”

ANSWER:

INTERROGATORY NO. 10:

Describe in detail the entire basis for Your contention that “[t]he Joint Ventures’ historical failure to make required payments . . . likely constitutes a material breach of the agreements between the Debtors and the Joint Ventures, giving rise to termination rights and other remedies on behalf of the Debtors” and identify relevant provisions of the Joint Venture agreements that support your contentions.

ANSWER:

INTERROGATORY NO. 11:

Describe in detail, and on an element-by-element basis, the entire basis for Your contention that the Debtors' estates cannot and/or should not be consolidated as proposed in subsection 5.1 of the Plan, including Your contention that substantive consolidation would result in "taking assets" and "diverting recoveries on such assets to, principally, creditors of AHI's subsidiaries, including Deerfield."

ANSWER:

INTERROGATORY NO. 12:

Describe in detail the financial consequences to the Debtors' estates and their creditors (including, without limitation, the amount and timing of any recoveries for the Debtors' creditors) in the absence of subsection 5.1 of the Plan.

ANSWER:

INTERROGATORY NO. 13:

Describe in detail the entire basis for Your assertion that "the Equity Committee is skeptical that the subsidiary Debtors hold any breach of fiduciary duty claims against the AHI Board/management" and Your contention that "to the extent that any subsidiary Debtors . . . do possess breach of fiduciary duty claims against the AHI Board/management, substantive consolidation is neither necessary nor appropriate to resolve any potential dispute regarding allocation of recoveries on account of such claims."

ANSWER:

INTERROGATORY NO. 14:

Describe in detail, and on an element-by-element basis, the entire basis for Your contention that the Debtors' exclusivity periods under Bankruptcy Code Section 1121 must or should be terminated pursuant to Bankruptcy Code Section 1121(d), including, without limitation, Your contention that "the unique and unfortunate circumstances of these cases also necessitate termination of the Debtors' exclusivity period at this stage of the proceedings."

ANSWER:

INTERROGATORY NO. 15:

Describe in detail the entire basis for Your contention that the Debtors “have not put forth a viable Chapter 11 plan.”

ANSWER:

INTERROGATORY NO. 16:

Identify with particularity, and describe in detail, any Communications with any Person involved with or regarding the terms, formulation, evaluation, analysis, or structuring of the Term Sheet and the transactions contemplated thereunder.

ANSWER:

INTERROGATORY NO. 17:

Identify with particularity and describe in detail (i) all analyses that You are aware of, have conducted, or are in possession of, with respect to the Plan and/or the Term Sheet; (ii) the entire basis underlying any such analyses; and (iii) the recoveries available to the Debtors’ creditors under the Term Sheet.

ANSWER:

INTERROGATORY NO. 18:

Describe in detail whether there is a funding source for the plan proposed in the Term Sheet, who or what entities will be funding the plan proposed in the Term Sheet, whether commitments to fund have been made and executed, and the breakdown of amounts to be funded by person/entity.

ANSWER:

INTERROGATORY NO. 19:

Identify with particularity the basis for Your contention that the DIP Order may be reconsidered pursuant to Fed. R. Bankr. P. 9024.

ANSWER:

Dated: Dallas, Texas
August 11, 2017

NORTON ROSE FULBRIGHT US LLP

By /s/ Scott P. Drake

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Debtors in Possession*

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure, I certify that a true and correct copy of the foregoing has been served on August 11, 2017, by electronic mail on the following counsel of record:

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**COUNSEL FOR THE OFFICIAL
COMMITTEE OF EQUITY SECURITY
HOLDERS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|--|
| In re: | : | Chapter 11 |
| | : | |
| ADPT DFW HOLDINGS LLC, <i>et al.</i> , | : | Case No. 17-31432-SGJ-11 |
| | : | |
| Debtors. | : | Jointly Administered Case No. 17-31432 |
| | : | |

**THE OFFICIAL COMMITTEE OF EQUITY SECURITY HOLDERS OF ADEPTUS
HEALTH INC.'S OBJECTIONS AND RESPONSES
TO THE DEBTORS' FIRST SET OF INTERROGATORIES
IN CONNECTION WITH DOCKET NO. 484, THE TRUSTEE MOTION**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and Rule 7033 of the Federal Rules of Bankruptcy Procedure, the Official Committee of Equity Security Holders of Adeptus Health Inc. (the "Equity Committee"), by and through its undersigned counsel, hereby serves its *Objections and Responses to the Debtors' First Set of Interrogatories in Connection with Docket No. 484, The Trustee Motion* (the "Interrogatories"), and states as follows:

GENERAL OBJECTIONS

1. The Equity Committee objections to each Instruction, Definition, and Interrogatory to the extent it is inconsistent with, or imposes obligations beyond that required by, the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, or any schedule or ruling that may be entered by the Court.

2. The Equity Committee objections to each Instruction, Definition, and Interrogatory to the extent that it seeks information, documents, or things protected by the attorney-client privilege, work-product doctrine, common-interest privilege, or any other applicable privilege, immunity, or protection.

3. The Equity Committee objections to each Instruction, Definition, and Interrogatory to the extent that it seeks information that is confidential information of third parties, and which the Equity Committee is obligated to maintain as confidential information.

4. The Equity Committee's investigation and discovery efforts are ongoing, and the Equity Committee reserves its right to amend or supplement these objections and responses as additional discovery and information becomes available, or in the event of error, inadvertent mistake, or omission.

5. The Equity Committee objects to each Instruction, Definition, and Interrogatory to the extent that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

6. By making these objections and responses to the Interrogatories, the Equity Committee does not waive, and hereby expressly reserves, its right to assert any and all objections as to the admissibility of such response into evidence in this matter, or in any

proceedings, on any and all grounds including but not limited to competency, relevancy, materiality, and privilege. Further, the Equity Committee makes these objections and responses to the Interrogatories without in any way implying that it considers the Interrogatories to be relevant or material to these chapter 11 cases.

7. No waiver of the above-stated objections shall be implied from inclusion of further or more specific objections in individual responses below or from the inclusion of a response.

8. The Equity Committee is willing to meet and confer on any and all objections and responses to these Interrogatories, including objections to Instructions and Definitions.

9. The Equity Committee objects to the definition of “Describe in detail” as overly broad and unduly burdensome to require the Equity Committee to state “all grounds, bases, facts, locations, and applicable dates . . . and identify all Persons involved.” The task of identifying “all” such things is not proportional to the needs of the case.

10. The Equity Committee objects to the definition of “You” or “Your” as overly broad, unduly burdensome, and vague to the extent it purports to include entities and persons that are not a party to these chapter 11 cases. As used herein, the “Equity Committee” refers to the Official Committee of Equity Security Holders of Adeptus Health Inc.

OBJECTIONS AND RESPONSES TO INTERROGATORIES

The Equity Committee’s responses are based upon information presently available to and located by the Equity Committee and its attorneys, and the Equity Committee reserves the right to amend or supplement its responses after further investigation and discovery.

INTERROGATORY NO. 1:

Identify with particularity any of PubCo's current or former employees, directors, or officers that have contacted You, that You contacted, or that You have otherwise had Communications with, regarding the JV agreements, allegations and assertions set forth in the Trustee Motion, and/or any other alleged mismanagement of PubCo or any of the Debtors, and any Causes of Action; and, with respect to any Person so identified, describe in detail (i) any and all Communications that You had with, or received from, such Person, including the subject of such Communications and (ii) any Documents and other information that any such Person identified, discussed, shared with, and/or provided to You.

ANSWER TO INTERROGATORY NO. 1:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 2:

Identify with particularity every Cause of Action that You contend that PubCo has or may have with respect to the Directors and Officers, the Sterling Parties, Deerfield, DLA, Norton Rose Fulbright, FTI, KPMG, any other alleged insider of a Debtor, and/or any other professional including, without limitation, any Causes of Action referenced in the Trustee Motion. In the response, please indicate, for each Causes of Action You identify, how PubCo suffered damages, who caused those damages, and under which legal theory PubCo is entitled to independently assert those claims.

ANSWER TO INTERROGATORY NO. 2:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 3:

Describe in detail the entire factual and legal basis for Your contention that any and all Causes of Action against PubCo's Directors and Officers, affiliates, insiders, and/or professionals, including any proceeds of such Causes of Action, are the sole property of PubCo.

ANSWER TO INTERROGATORY NO. 3:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 4:

Describe in detail whether You contend or believe that (i) PubCo, (ii) any other Debtor, or (iii) any Pre-IPO Unit Holders received any consideration or value in connection with or relating to the IPO and the Secondary Offerings, and, if so, describe in detail any such consideration or value allegedly received.

ANSWER TO INTERROGATORY NO. 4:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks

information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 5:

State whether You contend or believe that any Subsidiaries or Debtors have or had, directly or indirectly, a legal, equitable, or beneficial interest (including an interest based on any contract, statute, or common law) in any of the D&O Claims (including the proceeds thereof), Causes of Action (including the proceeds thereof) relating to the IPO and Secondary Offerings, any IPO or Secondary Offering proceeds, and/or other property owned or held by PubCo, and describe in detail the grounds for that contention, belief, or other position, and identify with particularity any Subsidiary or Debtor holds such an interest.

ANSWER TO INTERROGATORY NO. 5:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground

that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 6:

Describe in detail (i) the cost to the Debtors' estates associated with the appointment of a trustee and/or examiner in the Chapter 11 Cases; (ii) the manner in which You calculated the amounts stated in response in subsection (i) of this Interrogatory; and (iii) the entire basis for Your contention that "AHI submits that the cost of appointing a trustee solely for the AHI estate, to protect the interests of AHI, substantially outweigh any costs associated with such appointment."

ANSWER TO INTERROGATORY NO. 6:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity

Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 7:

Identify all agreements of any of the Debtors “where rejection may not be in the best interests of the Debtors’ estates” and describe, for each agreement identified, what You contend would be in the Debtors’ estates’ best interests, the basis for such contention, and any analysis or calculation relating to such contention.

ANSWER TO INTERROGATORY NO. 7:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee’s investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 8:

Describe in detail the entire basis for Your contention that the Debtors have “historically mismanaged” the joint ventures or any other aspect of their businesses, including Your contention that “[t]he Debtors’ historical mismanagement of the Joint Ventures is continuing unabated post-petition” and what course of action You contend the Debtors should take with respect to each of the Joint Ventures.

ANSWER TO INTERROGATORY NO. 8:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee’s investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 9:

Describe in detail the entire basis for Your contention that PubCo’s board and management are “squandering AHI’s assets for the primary benefit of Deerfield.”

ANSWER TO INTERROGATORY NO. 9:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee’s investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 10:

Describe in detail the entire basis for Your contention that “[t]he Joint Ventures’ historical failure to make required payments . . . likely constitutes a material breach of the agreements between the Debtors and the Joint Ventures, giving rise to termination rights and other remedies on behalf of the Debtors” and identify relevant provisions of the Joint Venture agreements that support your contentions.

ANSWER TO INTERROGATORY NO. 10:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee’s investigation and discovery efforts are ongoing

and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 11:

Describe in detail, and on an element-by-element basis, the entire basis for Your contention that the Debtors' estates cannot and/or should not be consolidated as proposed in subsection 5.1 of the Plan, including Your contention that substantive consolidation would result in "taking assets" and "diverting recoveries on such assets to, principally, creditors of AHI's subsidiaries, including Deerfield."

ANSWER TO INTERROGATORY NO. 11:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 12:

Describe in detail the financial consequences to the Debtors' estates and their creditors (including, without limitation, the amount and timing of any recoveries for the Debtors' creditors) in the absence of subsection 5.1 of the Plan.

ANSWER TO INTERROGATORY NO. 12:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee’s investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 13:

Describe in detail the entire basis for Your assertion that “the Equity Committee is skeptical that the subsidiary Debtors hold any breach of fiduciary duty claims against the AHI Board/management” and Your contention that “to the extent that any subsidiary Debtors . . . do possess breach of fiduciary duty claims against the AHI Board/management, substantive consolidation is neither necessary nor appropriate to resolve any potential dispute regarding allocation of recoveries on account of such claims.”

ANSWER TO INTERROGATORY NO. 13:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground

that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 14:

Describe in detail, and on an element-by-element basis, the entire basis for Your contention that the Debtors' exclusivity periods under Bankruptcy Code Section 1121 must or should be terminated pursuant to Bankruptcy Code Section 1121(d), including, without limitation, Your contention that "the unique and unfortunate circumstances of these cases also necessitate termination of the Debtors' exclusivity period at this stage of the proceedings."

ANSWER TO INTERROGATORY NO. 14:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity

Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 15:

Describe in detail the entire basis for Your contention that the Debtors “have not put forth a viable Chapter 11 plan.”

ANSWER TO INTERROGATORY NO. 15:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court’s jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee’s investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 16:

Identify with particularity, and describe in detail, any Communications with any Person involved with or regarding the terms, formulation, evaluation, analysis, or structuring of the Term Sheet and the transactions contemplated thereunder.

ANSWER TO INTERROGATORY NO. 16:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible

evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 17:

Identify with particularity and describe in detail (i) all analyses that You are aware of, have conducted, or are in possession of, with respect to the Plan and/or the Term Sheet; (ii) the entire basis underlying any such analyses; and (iii) the recoveries available to the Debtors' creditors under the Term Sheet.

ANSWER TO INTERROGATORY NO. 17:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the

Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 18:

Describe in detail whether there is a funding source for the plan proposed in the Term Sheet, who or what entities will be funding the plan proposed in the Term Sheet, whether commitments to fund have been made and executed, and the breakdown of amounts to be funded by person/entity.

ANSWER TO INTERROGATORY NO. 18:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it is compound and consists of multiple subparts that properly should be counted as separate interrogatories in accordance with Rule 33 of the Federal Rules of Civil Procedure. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

INTERROGATORY NO. 19:

Identify with particularity the basis for Your contention that the DIP Order may be reconsidered pursuant to Fed. R. Bankr. P. 9024.

ANSWER TO INTERROGATORY NO. 19:

The Equity Committee objects to this Interrogatory on the grounds that it is overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. The Equity Committee further objects to this Interrogatory to the extent it seeks information from third parties not subject to the Court's jurisdiction or under the control of the Equity Committee. In addition, the Equity Committee objects to this Interrogatory on the ground that it is premature, as the Equity Committee's investigation and discovery efforts are ongoing and not yet complete. The Equity Committee also objects to this Interrogatory on the ground that it improperly seeks to force the Equity Committee to marshal evidence. The Equity Committee will comply with relevant scheduling orders in this case.

Dated: New York, New York
August 18, 2017

By: /s/ Edward S. Weisfelner
Edward S. Weisfelner
Bennett S. Silverberg
D. Cameron Moxley
BROWN RUDNICK LLP
Seven Times Square
New York, NY 10036
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**COUNSEL FOR THE OFFICIAL
COMMITTEE OF EQUITY SECURITY
HOLDERS OF ADEPTUS HEALTH INC.**

Springer, Tim

From: Drake, Scott
Sent: Friday, August 18, 2017 8:30 PM
To: Moxley, D. Cameron
Cc: Boydston, Liz; Baldwin, Mark; Weisfelner, Edward S.; Silverberg, Bennett S.; Brimmage, Marty; Schultz, Sarah A.; Rakhee Patel (rpatel@winstead.com); Botter, David (dbotter@AkinGump.com); Warrick, Laura (lwarrick@akingump.com); Strubeck, Louis; Daniel, Theodore W.; Wilkes, Greg
Subject: Re: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion
Attachments: image001.jpg

Cameron- We have reviewed the Equity Committee's responses. They are actually not responses but merely a litany of objections. The interrogatories were narrowly tailored to your trustee motion. They largely sought for the committee to provide the bases for the contentions asserted in the motion. Every single request is objected to on the basis that the committee's investigation is not complete, the information is not under the control of the Equity Committee or--even when the interrogatory quotes your motion-- somehow not reasonably calculated to lead to the discovery of admissible evidence.

Either these objections were served improperly as a delay tactic or they are factually accurate and therefore troubling. Assuming they were merely served for delay, we request you provide us with substantive responses, verified per the rules, by Monday at noon. If, on the other hand, the responses are accurate because the factual contentions in the Trustee motion have no evidentiary support (notably little if any contentions are made on information and belief or suggest a need for further investigation) then we have other issues to discuss.

Please let us know if you can amend your responses by Monday or if you would like to discuss an alternative schedule. While there has been a lot going on, we are entitled to this information before the depositions.

Thanks,

Scott

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nortonrosefulbright.com

On Aug 18, 2017, at 5:45 PM, Moxley, D. Cameron <DMoxley@brownrudnick.com> wrote:

Counsel,

Attached please find The Official Committee of Equity Security Holders of Adeptus Health Inc.'s Objections and Responses to the Debtors' First Set of Interrogatories in Connection with Docket No. 484, The Trustee Motion.

Regards,



Cameron Moxley

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From: Boydston, Liz [<mailto:liz.boydston@nortonrosefulbright.com>]
Sent: Friday, August 11, 2017 6:08 PM
To: Baldwin, Mark; Moxley, D. Cameron; Weisfelner, Edward S.; Silverberg, Bennett S.
Cc: 'Brimmage, Marty'; Schultz, Sarah A.; Rakhee Patel (rpatel@winstead.com); Botter, David (dbotter@AkinGump.com); Warrick, Laura (lwarrick@akingump.com); Strubeck, Louis; Drake, Scott; Daniel, Theodore W.; Wilkes, Greg
Subject: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion

External E-mail. Use caution accessing links or attachments.

Counsel,

As indicated during the meet and confer call yesterday, attached please find the:

- ? Debtors' First Set of Requests for Production of Documents in Connection with Docket No. 484, the Trustee Motion, and
- ? Debtor's First Set of Interrogatories in Connection with Docket No. 484, the Trustee Motion

Please let us know if you would like to set up a separate meet and confer from the one currently scheduled for Tuesday.

We requested dates for depositions of Messrs Amron, Jackobowski, DeFelice, and Kearney. We intend to send depo notices once we receive dates.

Thank you.

Liz Boydston | Sr. Associate
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<EC Objections & Responses to the Debtors' First Set of Interrogatories.pdf>

Springer, Tim

From: Drake, Scott
Sent: Tuesday, August 22, 2017 4:00 PM
To: 'Baldwin, Mark'; Moxley, D. Cameron
Cc: Boydston, Liz; Weisfelner, Edward S.; Silverberg, Bennett S.; Brimmage, Marty; Schultz, Sarah A.; Rakhee Patel (rpatel@winstead.com); Botter, David (dbotter@AkinGump.com); Warrick, Laura (lwarrick@akingump.com); Strubeck, Louis; Daniel, Theodore W.; Wilkes, Greg
Subject: RE: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion

Mark- We do not fully understand your email. We made our position clear shortly after we received your objections Friday night. The Equity Committee chose to ignore our email completely. The Equity Committee then let our Monday deadline come and go without any response. We decided to give you an additional day in order to respond. I fail to see how giving you additional time to offer some response is "disturbing." In any event, our position was made clear almost immediately on Friday night and it has not ever changed.

Most troubling is that the fundamental question of whether the Equity Committee is improperly withholding discoverable information or simply had no support for its motion when filed still remains unanswered.

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From: Baldwin, Mark [mailto:MBaldwin@brownrudnick.com]
Sent: Tuesday, August 22, 2017 3:42 PM
To: Drake, Scott <scott.drake@nortonrosefulbright.com>; Moxley, D. Cameron <DMoxley@brownrudnick.com>
Cc: Boydston, Liz <liz.boydston@nortonrosefulbright.com>; Weisfelner, Edward S. <EWeisfelner@brownrudnick.com>; Silverberg, Bennett S. <BSilverberg@brownrudnick.com>; Brimmage, Marty <mbrimmage@akingump.com>; Schultz, Sarah A. <sschultz@AkinGump.com>; Rakhee Patel (rpatel@winstead.com) <rpatel@winstead.com>; Botter, David (dbotter@AkinGump.com) <dbotter@AkinGump.com>; Warrick, Laura (lwarrick@akingump.com) <lwarrick@akingump.com>; Strubeck, Louis <louis.strubeck@nortonrosefulbright.com>; Daniel, Theodore W. <ted.daniel@nortonrosefulbright.com>; Wilkes, Greg <greg.wilkes@nortonrosefulbright.com>
Subject: RE: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion

Scott, I just arrived in Dallas for the depositions this week. It is a little disturbing that you are now threatening not to proceed with those depositions because of an objection to interrogatories that has been pending since last week, particularly since Debtors have interposed similar objections to discovery. As far I know, it's entirely inappropriate to instruct a deposition witness not to answer a question because the other party has objected to interrogatories. Cameron and I are available to chat this evening after 5:30 CT. Please let us know your availability.

From: Drake, Scott [<mailto:scott.drake@nortonrosefulbright.com>]
Sent: Tuesday, August 22, 2017 3:55 PM
To: Moxley, D. Cameron
Cc: Boydston, Liz; Baldwin, Mark; Weisfelner, Edward S.; Silverberg, Bennett S.; Brimmage, Marty; Schultz, Sarah A.; Rakhee Patel (rpatel@winstead.com); Botter, David (dbotter@AkinGump.com); Warrick, Laura (lwarrick@akingump.com); Strubeck, Louis; Daniel, Theodore W.; Wilkes, Greg
Subject: RE: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion

External E-mail. Use caution accessing links or attachments.

Cameron- We have still not received any responses to our interrogatories or my email from Friday requesting actual responses. As stated in the prior email, either the Equity Committee is improperly withholding information from the Debtors or the Equity Committee did not have any basis for bringing its motion in the first place. Either alternative is unacceptable. We are entitled to responses to the interrogatories before any depositions go forward. If your existing objections are correct that the Equity Committee is not in possession of any information to support its motion, we ask that you immediately withdraw the motion and the depositions can go forward solely on the topic of confirmation. If you do not withdraw the motion, then we can proceed with the depositions provided that we have substantive, verified responses at least 12 hours before the start of any deposition.

We are happy to confer further with you on this should you wish to discuss it. If we do not hear anything, we will seek any and all relief necessary including a motion to compel, motion for protective order and/or motion to strike (and will consider you opposed based on your lack of response to date).

Thanks,
Scott

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From: Drake, Scott
Sent: Friday, August 18, 2017 8:30 PM
To: Moxley, D. Cameron <DMoxley@brownrudnick.com>
Cc: Boydston, Liz <liz.boydston@nortonrosefulbright.com>; Baldwin, Mark <MBaldwin@brownrudnick.com>; Weisfelner, Edward S. <EWeisfelner@brownrudnick.com>; Silverberg, Bennett S. <BSilverberg@brownrudnick.com>; Brimmage, Marty <mbrimmage@akingump.com>; Schultz, Sarah A. <sschultz@AkinGump.com>; Rakhee Patel (rpatel@winstead.com) <rpatel@winstead.com>; Botter, David (dbotter@AkinGump.com) <dbotter@AkinGump.com>; Warrick, Laura (lwarrick@akingump.com) <lwarrick@akingump.com>; Strubeck, Louis <louis.strubeck@nortonrosefulbright.com>; Daniel, Theodore W. <ted.daniel@nortonrosefulbright.com>; Wilkes, Greg <greg.wilkes@nortonrosefulbright.com>
Subject: Re: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion

Cameron- We have reviewed the Equity Committee's responses. They are actually not responses but merely a litany of objections. The interrogatories were narrowly tailored to your trustee motion. They largely sought for the committee to provide the bases for the contentions asserted in the motion. Every single request is objected to on the basis that the committee's investigation is not complete, the information is not under the control of the Equity Committee or--even when the interrogatory quotes your motion-- somehow not reasonably calculated to lead to the discovery of admissible evidence.

Either these objections were served improperly as a delay tactic or they are factually accurate and therefore troubling. Assuming they were merely served for delay, we request you provide us with substantive responses, verified per the rules, by Monday at noon. If, on the other hand, the responses are accurate because the factual contentions in the Trustee motion have no evidentiary support (notably little if any contentions are made on information and belief or suggest a need for further investigation) then we have other issues to discuss.

Please let us know if you can amend your responses by Monday or if you would like to discuss an alternative schedule. While there has been a lot going on, we are entitled to this information before the depositions.

Thanks,

Scott

Scott P. Drake | Partner
Norton Rose Fulbright US LLP
2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932, United States
Tel +1 214 855 8341 | Fax + 1 214 855 8200
scott.drake@nortonrosefulbright.com

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Law around the world
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On Aug 18, 2017, at 5:45 PM, Moxley, D. Cameron <DMoxley@brownrudnick.com> wrote:

Counsel,

Attached please find The Official Committee of Equity Security Holders of Adeptus Health Inc.'s Objections and Responses to the Debtors' First Set of Interrogatories in Connection with Docket No. 484, The Trustee Motion.

Regards,



Cameron Moxley

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Seven Times Square
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T: 212-209-4909
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Please consider the environment before printing this e-mail

From: Boydston, Liz [<mailto:liz.boydston@nortonrosefulbright.com>]
Sent: Friday, August 11, 2017 6:08 PM
To: Baldwin, Mark; Moxley, D. Cameron; Weisfelner, Edward S.; Silverberg, Bennett S.
Cc: 'Brimmage, Marty'; Schultz, Sarah A.; Rakhee Patel (rpatel@winstead.com); Botter, David (dbotter@AkinGump.com); Warrick, Laura (lwarrick@akingump.com); Strubeck, Louis; Drake, Scott; Daniel, Theodore W.; Wilkes, Greg
Subject: Adeptus: Debtors' Discovery to Equity Committee Relating to Trustee Motion

External E-mail. Use caution accessing links or attachments.

Counsel,

As indicated during the meet and confer call yesterday, attached please find the:

- ? Debtors' First Set of Requests for Production of Documents in Connection with Docket No. 484, the Trustee Motion, and
- ? Debtor's First Set of Interrogatories in Connection with Docket No. 484, the Trustee Motion

Please let us know if you would like to set up a separate meet and confer from the one currently scheduled for Tuesday.

We requested dates for depositions of Messrs Amron, Jakobowski, DeFelice, and Kearney. We intend to send depo notices once we receive dates.

Thank you.

Liz Boydston | Sr. Associate
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Tel +1 214 855 7475 | Fax +1 214 855 8200
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<EC Objections & Responses to the Debtors' First Set of Interrogatories.pdf>

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**COUNSEL FOR THE OFFICIAL
COMMITTEE OF EQUITY SECURITY
HOLDERS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|--|
| | : | |
| In re: | : | Chapter 11 |
| | : | |
| ADPT DFW HOLDINGS LLC, <i>et al.</i> , | : | Case No. 17-31432-SGJ-11 |
| | : | |
| Debtors. | : | Jointly Administered Case No. 17-31432 |
| | : | |

SECOND AMENDED NOTICE OF DEPOSITION OF GREGORY W. SCOTT

TO: Gregory W. Scott, c/o Norton Rose Fulbright US LLP, Attention: Louis R. Strubeck, Jr., 2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932.

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure (the “Federal Rules”), as made applicable to these proceedings by Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), counsel for the Official Committee of Equity Security Holders of Adeptus Health Inc. (the “Equity

Committee”) will take the deposition of Gregory W. Scott in the above-captioned chapter 11 cases in connection with both the confirmation hearing scheduled to begin on September 14, 2017 and the *Motion of the Official Committee of Equity Security Holders of Adeptus Health Inc. for an Order (I) Appointing a Trustee for the Chapter 11 Estate of Adeptus Health Inc. Pursuant to Bankruptcy Code Section 1104(a); or, Alternatively, (II) Appointing an Examiner Pursuant to Bankruptcy Code Section 1104(c) and Terminating the Debtors’ Exclusivity Period Pursuant to Bankruptcy Code Section 1121(d)* [Doc. No. 484] (the “Trustee Motion”) and the relief requested therein.¹

The deposition will commence on **August 23, 2017 at 10 a.m.** (Prevailing Central Time) at the offices of Norton Rose Fulbright US LLP, 2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932, **or at such other time and place as may be agreed upon by counsel.**

The deposition shall be taken upon oral examination before an officer authorized by law to administer oaths and may be recorded by videographer and/or by stenographic means.

¹ Capitalized terms used but not defined herein shall have the meaning ascribed in the Trustee Motion.

Dated: New York, New York
August 21, 2017

By: /s/ Edward S. Weisfelner

Edward S. Weisfelner

Bennett S. Silverberg

D. Cameron Moxley

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**COUNSEL FOR THE OFFICIAL
COMMITTEE OF EQUITY SECURITY
HOLDERS**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|--|
| In re: | : | Chapter 11 |
| | : | |
| ADPT DFW HOLDINGS LLC, <i>et al.</i> , | : | Case No. 17-31432-SGJ-11 |
| | : | |
| Debtors. | : | Jointly Administered Case No. 17-31432 |
| | : | |

SECOND AMENDED NOTICE OF DEPOSITION OF DEBTORS

TO: ADPT DFW Holdings LLC and its above-captioned affiliated debtors in possession (collectively, the “Debtors”), c/o Norton Rose Fulbright US LLP, Attention: Louis R. Strubeck, Jr., 2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932.

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure (the “Federal Rules”), as made applicable to these proceedings by Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), counsel

for the Official Committee of Equity Security Holders of Adeptus Health Inc. (the “Equity Committee”) will take the deposition of the Debtors in the above-captioned chapter 11 cases in connection with both the confirmation hearing scheduled to begin on September 14, 2017 and the *Motion of the Official Committee of Equity Security Holders of Adeptus Health Inc. for an Order (I) Appointing a Trustee for the Chapter 11 Estate of Adeptus Health Inc. Pursuant to Bankruptcy Code Section 1104(a); or, Alternatively, (II) Appointing an Examiner Pursuant to Bankruptcy Code Section 1104(c) and Terminating the Debtors’ Exclusivity Period Pursuant to Bankruptcy Code Section 1121(d)* [Doc. No. 484] (the “Trustee Motion”) and the relief requested therein.¹

The deposition will commence on **August 24, 2017 at 9 a.m.** (Prevailing Central Time) at the offices of Norton Rose Fulbright US LLP, 2200 Ross Avenue, Suite 3600, Dallas, Texas 75201-7932, **or at such other time and place as may be agreed upon by counsel.**

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules, the Debtors are required to designate one or more officers, directors, managing agents, or other persons who will testify on their behalf with respect to each of the topics listed below. In addition, the Debtors are requested to provide the undersigned counsel with written notice, at least two business days in advance of the deposition, of the designation of the name(s) and position(s) of the designated witnesses and the topic(s) on which each person will testify.

The deposition shall be taken upon oral examination before an officer authorized by law to administer oaths and may be recorded by videographer and/or by stenographic means.

¹ Capitalized terms used but not defined herein shall have the meaning ascribed in the Trustee Motion.

Rule 30(b)(6) Deposition Topics

1. Negotiations concerning the *Debtors' Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code*, filed with the Bankruptcy Court on April 19, 2017 [Doc. No. 15] (the "Plan") and the *Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code*, filed with the Bankruptcy Court on July 19, 2017 [Doc. No. 451] (the "Amended Plan").

2. The DIP Facility, described in the Amended Plan (the "DIP Facility"), and the Superpriority Secured Debtor-in-Possession Credit Agreement, dated as of April 19, 2017, by and among Adeptus Health Inc., as Borrower, First Choice ER, LLC, Adeptus Health LLC, and certain subsidiaries of Borrower, as guarantors, the DIP Facility Agent, and the DIP Facility Lenders, with any assignments, amendments, modifications, or supplements thereto as permitted by the DIP Facility Order or any other order of the Bankruptcy Court (the "DIP Facility Loan Agreement"), and any alternatives thereto.

3. Valuations or other analyses of the Debtors' businesses and/or assets.

4. Negotiations concerning the respective joint ventures described in the *Disclosure Statement for Debtors' First Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code*, filed with the Bankruptcy Court on July 19, 2017 [Doc. No. 452] (the "Amended Disclosure Statement"), including but not limited to negotiations concerning restructuring any joint venture agreements.

5. Discussions with Deerfield Management Company, L.P., and/or its affiliates Deerfield Private Design Fund IV, L.P., Deerfield Partners, L.P., and Deerfield International Master Fund, L.P., and any of their employees, agents, attorneys, officers, directors, executives or insiders or any of its affiliates, subsidiaries, or parent companies, including its subsidiaries' or

parent companies' employees, agents, attorneys, officers, directors, executives or insiders ("Deerfield") and/or the Official Committee of Unsecured Creditors of ADPT DFW Holdings LLC (the "Creditors Committee") concerning the Debtors' management team and their continued employment with the Debtors upon consummation of a chapter 11 plan of reorganization.

6. Discussions with Deerfield, the Debtors' management team, and/or the Creditors Committee concerning the formulation of the Debtors' emergence projections and business plan.

7. Discussions with MPT Operating Partnership, L.P. and any of its employees, agents, attorneys, officers, directors, executives or insiders or any of its affiliates, subsidiaries, or parent companies, including its subsidiaries' or parent companies' employees, agents, attorneys, officers, directors, executives or insiders.

8. The Debtors' process in analyzing their books and records.

9. Evidence the Debtors will rely upon in support of the Amended Plan, including but not limited to evidence reflecting any confusion by creditors and evidence the Debtors intend to rely upon to support their claim of substantive consolidation.

10. The Debtors' cash management and accounting systems.

11. The Debtors' decision to continue to perform under the respective agreements with Texas Health Resources, University of Colorado Health, Dignity Health, and Mount Carmel Health System (the "JV Partners"), including consideration of rejecting, terminating, or causing a buyout of the Debtors' interests in the respective contracts with the JV Partners, whether continuing to perform under the respective contracts with the JV Partners is in the Debtors' best interests, and any other considerations in connection with the decision to continue to perform under the respective contracts with the JV Partners.

12. The Debtors' intercompany loans, intercompany ledger, and intercompany transactions.

13. The Debtors' decision to reject the Tax Receivable Agreement among Adeptus Health Inc. and the persons named therein dated as of June 25, 2014 (the "Tax Receivable Agreement"), including consideration of potential rejection damages, whether rejection of the Tax Receivable Agreement is in the Debtors' best interests as compared with assuming the Tax Receivable Agreement, and any other considerations in connection with the decision to reject the Tax Receivable Agreement.

14. Assistance in filing claims provided by the Debtors or the Debtors' legal, financial, or other professional advisors.

15. The Debtors' consideration of conflicts by professionals and incoming requests and decisions to provide conflict waivers to the Debtors' professionals.

16. Departures or noticed departures of the Debtors' personnel, including departures or noticed departures of "key personnel" or concerns about the departures of personnel.

17. The negotiations concerning the McKesson² contracts (the "McKesson Contracts"), including proposal and marketing materials McKesson provided to the Debtors in connection with the McKesson Contracts and such negotiations.

18. The Debtors' transition to McKesson and decision to enter into the McKesson Contracts, including the expected services and benefits to be gained under the McKesson Contracts.

19. The actual services McKesson provided under the McKesson Contracts and for which entities McKesson provided services.

² "McKesson" means McKesson Corporation, PST Services, Inc., an affiliate of McKesson Corporation, and each of their agents, accountants, financial advisors, employees, attorneys, officers, directors, direct or indirect shareholders, members, representatives, affiliates, subsidiaries, predecessors and/or successors.

20. Any issues, disputes, or concerns the Debtors identified or experienced in connection with McKesson's services under the McKesson Contracts, including complaints the Debtors raised with McKesson concerning McKesson's performance under the McKesson Contracts.

21. Potential claims and causes of action the Debtors may have against McKesson.

22. The Debtors' transition from McKesson to another service provider, including the identity and qualifications of the potential replacement service provider, negotiations with and proposed terms with the potential replacement service provider, and the analysis concerning the decision to select the potential replacement service provider.

23. The nature and scope of the Debtors' methodology for searching for, collecting, and producing documents in response to discovery requests directed to the Debtors.

24. All other subjects covered in the Trustee Motion.

Dated: New York, New York
August 21, 2017

By: /s/ Edward S. Weisfelner

Edward S. Weisfelner

Bennett S. Silverberg

D. Cameron Moxley

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**COUNSEL FOR THE OFFICIAL
COMMITTEE OF EQUITY SECURITY
HOLDERS OF ADEPTUS HEALTH INC.**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

| | | |
|--|---|--|
| ----- | § | |
| In re: | § | Chapter 11 |
| | § | |
| ADPT DFW HOLDINGS LLC, <i>et al.</i> , | § | Case No. 17-31432 |
| | § | |
| Debtors. | § | Jointly Administered under Case No. 17-31432 |
| ----- | § | |

**ORDER ON DEBTORS' EMERGENCY MOTION TO QUASH DEPOSITION
NOTICES AND MOTION TO COMPEL ANSWERS TO INTERROGATORIES**

After considering the Emergency Motion to Quash Deposition Notices and Motion to Compel Answers to Interrogatories, it is hereby

ORDERED that the deposition notices of Gregory W. Scott and of Debtors are hereby quashed; and thereby

ORDERED that Gregory W. Scott and representatives of Debtors need not appear for their depositions;

ORDERED that the Equity Committee provide answers to the Debtors' First Set of Interrogatories in Connection with Docket No. 484;

ORDERED that the Court shall retain jurisdiction to interpret, amend, or otherwise enforce this Order.

IT IS SO ORDERED.

END OF ORDER

Appendix
(Sorted Alphabetically)

| # | Debtor Name | Case No. | EIN |
|------|--|----------|------------|
| 141. | Adeptus Health Colorado Holdings LLC | 17-31448 | 30-0857912 |
| 142. | Adeptus Health Inc. | 17-31434 | 46-5037387 |
| 143. | Adeptus Health LLC | 17-31435 | 32-0432716 |
| 144. | Adeptus Health Management LLC | 17-31455 | 32-0448472 |
| 145. | Adeptus Health Phoenix Holdings LLC | 17-31461 | 35-2487075 |
| 146. | Adeptus Health Ventures LLC | 17-31466 | 36-4802997 |
| 147. | ADPT Columbus Holdings LLC | 17-31471 | 36-4835265 |
| 148. | ADPT DFW Holdings LLC | 17-31432 | 30-0857947 |
| 149. | ADPT Houston Holdings LLC | 17-31479 | 30-0857977 |
| 150. | ADPT New Orleans Holdings LLC | 17-31486 | 32-0479313 |
| 151. | ADPT New Orleans Management LLC | 17-31493 | Pending |
| 152. | ADPT-AZ MPT Holdings LLC | 17-31497 | 61-1772047 |
| 153. | ADPT-AZ RE Holdings LLC | 17-31502 | 47-5241979 |
| 154. | ADPT-CO MPT Holdings LLC | 17-31508 | 47-3512571 |
| 155. | ADPT-CO RE Holdings LLC | 17-31512 | 47-3565144 |
| 156. | ADPT-Columbus MPT Holdings LLC | 17-31519 | Pending |
| 157. | ADPT-Columbus RE Holdings LLC | 17-31523 | Pending |
| 158. | ADPT-DFW MPT Holdings LLC | 17-31527 | 81-0772445 |
| 159. | ADPT-DFW RE Holdings LLC | 17-31532 | 81-0785981 |
| 160. | ADPT-Houston MPT Holdings LLC | 17-31533 | 30-0914017 |
| 161. | ADPT-Houston RE Holdings LLC | 17-31536 | 61-1781468 |
| 162. | ADPT-LA MPT Holdings LLC | 17-31542 | 81-0752643 |
| 163. | ADPT-LA RE Holdings LLC | 17-31545 | 81-0758384 |
| 164. | AJNH Medical Center LLC | 17-31548 | 36-4729524 |
| 165. | Alamo Heights SA Medical Center LLC | 17-31553 | 35-2547715 |
| 166. | Algiers Medical Center LLC | 17-31556 | 32-0455775 |
| 167. | Alvin Medical Center LLC | 17-31561 | 90-1008817 |
| 168. | Anthem Medical Center LLC | 17-31564 | 37-1740119 |
| 169. | Antoine Medical Center LLC | 17-31440 | 35-2537322 |
| 170. | Arizona General ER LLC | 17-31444 | 90-1025598 |
| 171. | Atascocita 1960 Medical Center LLC | 17-31449 | 36-4780687 |
| 172. | Austin Brodie Medical Center LLC | 17-31454 | 61-1713294 |
| 173. | Baytown Medical Center LLC | 17-31456 | 30-0840445 |
| 174. | Bella Terra Medical Center LLC | 17-31459 | 80-0957867 |
| 175. | Bender's Landing Medical Center LLC | 17-31468 | 37-1752156 |
| 176. | Blacklick Woods Medical Center LLC | 17-31475 | 30-0805532 |
| 177. | Briar Forest-Eldridge Medical Center LLC | 17-31482 | 35-2481862 |
| 178. | Broad Wagoner Medical Center LLC | 17-31488 | 35-2492252 |
| 179. | Brushy Creek Medical Center LLC | 17-31494 | 38-3923792 |
| 180. | Camelback 83rd Medical Center LLC | 17-31498 | 38-3945993 |
| 181. | Cedar Park Lakeline Medical Center LLC | 17-31505 | 35-2493773 |
| 182. | Centennial Medical Center LLC | 17-31509 | 32-0436930 |
| 183. | Center Street DP Medical Center LLC | 17-31516 | 35-2453223 |
| 184. | Chandler Germann Medical Center LLC | 17-31521 | 80-0938469 |
| 185. | Chandler Heights Medical Center LLC | 17-31525 | 32-0456525 |

| # | Debtor Name | Case No. | EIN |
|------|---|----------|------------|
| 186. | Cinco Ranch Medical Center LLC | 17-31529 | 61-1744313 |
| 187. | Colonial Lakes Medical Center LLC | 17-31535 | 90-1004044 |
| 188. | Colorado General Hospital LLC | 17-31539 | 35-2506314 |
| 189. | Conroe Medical Center LLC | 17-31544 | 37-1743660 |
| 190. | Converse Medical Center LLC | 17-31551 | 30-0820305 |
| 191. | Copperwood Medical Center LLC | 17-31554 | 84-1697403 |
| 192. | Creekside Forest Medical Center LLC | 17-31557 | 36-4781064 |
| 193. | Culebra-Tezel Medical Center LLC | 17-31559 | 90-1020838 |
| 194. | De Zavala Medical Center LLC | 17-31560 | 30-0879734 |
| 195. | Dublin Medical Center LLC | 17-31563 | 80-0965351 |
| 196. | Eagles Nest Medical Center LLC | 17-31565 | 04-3847518 |
| 197. | East Mesa Medical Center LLC | 17-31437 | 90-1033851 |
| 198. | East Pflugerville Medical Center LLC | 17-31439 | 90-1023315 |
| 199. | East Riverside Medical Center LLC | 17-31442 | 38-3973259 |
| 200. | ECC Management, LLC | 17-31443 | 16-1711879 |
| 201. | FCER Management, LLC | 17-31447 | 11-3798239 |
| 202. | First Choice ER, LLC | 17-31436 | 27-5348156 |
| 203. | First Texas Hospital Cy-Fair LLC | 17-31451 | 47-3480091 |
| 204. | Four Points Medical Center LLC | 17-31464 | 38-3938637 |
| 205. | Friendswood Medical Center LLC | 17-31469 | 38-3916132 |
| 206. | FTH Houston Partners LLC | 17-31474 | 47-3466871 |
| 207. | Garland Centerville Medical Center LLC | 17-31477 | 35-2537960 |
| 208. | Gilbert Medical Center LLC | 17-31481 | 80-0940827 |
| 209. | Gleannloch Farms Medical Center LLC | 17-31485 | 35-2481256 |
| 210. | Glendale Medical Center LLC | 17-31489 | 90-1012820 |
| 211. | Goodyear Medical Center LLC | 17-31490 | 90-1007336 |
| 212. | Greenville Stacy Medical Center LLC | 17-31492 | 38-3926926 |
| 213. | Guadalupe River Medical Center LLC | 17-31496 | 35-2514826 |
| 214. | Hampden Tower Medical Center LLC | 17-31499 | 38-3928757 |
| 215. | Helotes Medical Center LLC | 17-31501 | 36-4782313 |
| 216. | Hilliard Medical Center LLC | 17-31504 | 35-2491198 |
| 217. | Houston 9520 Jones Medical Center LLC | 17-31507 | 32-0432459 |
| 218. | Houston FM 1960 Medical Center LLC | 17-31511 | 37-1783329 |
| 219. | Katy ER Center LLC | 17-31514 | 45-2583773 |
| 220. | Keller Medical Center LLC | 17-31517 | 61-1736669 |
| 221. | Kingwood Medical Center LLC | 17-31520 | 80-0684495 |
| 222. | Kuykendahl Medical Center LLC | 17-31524 | 34-2028269 |
| 223. | La Porte Medical Center LLC | 17-31526 | 80-0927953 |
| 224. | Lakewood Forest Medical Center LLC | 17-31530 | 90-1013791 |
| 225. | League City Medical Center LLC | 17-31438 | 36-4766358 |
| 226. | Legacy Trails Medical Center LLC | 17-31441 | 61-1744649 |
| 227. | Lewis Center Medical Center LLC | 17-31445 | 32-0431791 |
| 228. | Litchfield Park Medical Center LLC | 17-31446 | 36-4801379 |
| 229. | Louetta Medical Center LLC | 17-31450 | 74-3178584 |
| 230. | Marrero Medical Center LLC | 17-31453 | 61-1753468 |
| 231. | Meadowbrook Heights Medical Center LLC | 17-31457 | 32-0448039 |
| 232. | Medical Center of Crosby Lynchburg LLC | 17-31458 | 38-3922039 |
| 233. | Medical Center of Spring Rayford Richards LLC | 17-31462 | 37-1747613 |

| # | Debtor Name | Case No. | EIN |
|------|---|----------|------------|
| 234. | Mesa Tierra Medical Center LLC | 17-31465 | 35-2523890 |
| 235. | Midlothian Medical Center LLC | 17-31470 | 30-0802928 |
| 236. | Mountain Park Ranch Medical Center LLC | 17-31473 | 38-3939092 |
| 237. | National Medical Professionals of Arizona LLC | 17-31478 | 37-1757007 |
| 238. | National Medical Professionals of Ohio LLC | 17-31483 | 30-0829176 |
| 239. | New Orleans East Medical Center LLC | 17-31510 | 61-1753435 |
| 240. | Northwest Harris County Medical Center LLC | 17-31538 | 36-4781722 |
| 241. | Ohio General ER LLC | 17-31540 | 38-3918055 |
| 242. | Ohio General Hospital LLC | 17-31547 | 80-0956267 |
| 243. | OpFree Licensing LP | 17-31549 | 01-0831027 |
| 244. | OpFree RE Investments, Ltd. | 17-31558 | 06-1740727 |
| 245. | OpFree, LLC | 17-31562 | 34-2028263 |
| 246. | Pearland 518 Medical Center LLC | 17-31566 | 90-1025398 |
| 247. | Pearland Parkway Medical Center LLC | 17-31567 | 51-0576704 |
| 248. | Pearland Sunrise Medical Center LLC | 17-31568 | 90-1001726 |
| 249. | Pflugerville Medical Center LLC | 17-31569 | 45-2552050 |
| 250. | Potranco Medical Center LLC | 17-31570 | 80-0966887 |
| 251. | Provinces Medical Center LLC | 17-31571 | 80-0967881 |
| 252. | Queen Creek Medical Center LLC | 17-31572 | 32-0457346 |
| 253. | Rosenberg Medical Center LLC | 17-31452 | 80-0964882 |
| 254. | Roy Richard Medical Center LLC | 17-31460 | 35-2491802 |
| 255. | San Antonio Nacogdoches Medical Center LLC | 17-31463 | 80-0937326 |
| 256. | San Tan Valley Medical Center LLC | 17-31467 | 36-4801184 |
| 257. | Seguin Foster Medical Center LLC | 17-31472 | 35-2532650 |
| 258. | Sienna Plantation Medical Center LLC | 17-31476 | 90-1009094 |
| 259. | South Bend Medical Center LLC | 17-31480 | 61-1770288 |
| 260. | South Carrier Medical Center LLC | 17-31484 | 32-0429602 |
| 261. | South Green Oaks Medical Center LLC | 17-31487 | 90-1012518 |
| 262. | Spanish Oaks Medical Center LLC | 17-31491 | 90-1012951 |
| 263. | Spring 2920 Medical Center LLC | 17-31495 | 36-4776092 |
| 264. | Spring Green Medical Center LLC | 17-31500 | Pending |
| 265. | SSHMedical Center LLC | 17-31503 | 77-0666943 |
| 266. | Sterling Ridge Medical Center II LLC | 17-31506 | 32-0439505 |
| 267. | Sterling Ridge Medical Center LLC | 17-31513 | 16-1711883 |
| 268. | Summerwood Medical Center LLC | 17-31515 | 30-0802964 |
| 269. | Surprise Medical Center LLC | 17-31518 | 90-1012038 |
| 270. | SW Chandler Medical Center LLC | 17-31522 | 90-1032288 |
| 271. | Sycamore School Medical Center LLC | 17-31528 | 35-2494277 |
| 272. | Tempe McClintock Baseline Medical Center LLC | 17-31531 | 38-3923748 |
| 273. | Tempe Rural-Baseline Medical Center LLC | 17-31534 | 30-0852296 |
| 274. | Texas Regional Hospital LLC | 17-31537 | 37-1753820 |
| 275. | Victory Lakes Medical Center LLC | 17-31541 | 37-1751372 |
| 276. | Wadsworth-Belleview Medical Center LLC | 17-31543 | 35-2486458 |
| 277. | Waterside Medical Center LLC | 17-31546 | 36-4767886 |
| 278. | White Settlement Medical Center LLC | 17-31550 | 38-3970573 |
| 279. | Wilderness-Hardy Oak Medical Center LLC | 17-31552 | 80-0954867 |
| 280. | William Cannon Medical Center LLC | 17-31555 | 35-2493839 |

(Sorted Numerically By Case Number)

| # | Debtor Name | Case No. | EIN |
|------|---|----------|------------|
| 141. | ADPT DFW Holdings LLC | 17-31432 | 30-0857947 |
| 142. | Adeptus Health Inc. | 17-31434 | 46-5037387 |
| 143. | Adeptus Health LLC | 17-31435 | 32-0432716 |
| 144. | First Choice ER, LLC | 17-31436 | 27-5348156 |
| 145. | East Mesa Medical Center LLC | 17-31437 | 90-1033851 |
| 146. | League City Medical Center LLC | 17-31438 | 36-4766358 |
| 147. | East Pflugerville Medical Center LLC | 17-31439 | 90-1023315 |
| 148. | Antoine Medical Center LLC | 17-31440 | 35-2537322 |
| 149. | Legacy Trails Medical Center LLC | 17-31441 | 61-1744649 |
| 150. | East Riverside Medical Center LLC | 17-31442 | 38-3973259 |
| 151. | ECC Management, LLC | 17-31443 | 16-1711879 |
| 152. | Arizona General ER LLC | 17-31444 | 90-1025598 |
| 153. | Lewis Center Medical Center LLC | 17-31445 | 32-0431791 |
| 154. | Litchfield Park Medical Center LLC | 17-31446 | 36-4801379 |
| 155. | FCER Management, LLC | 17-31447 | 11-3798239 |
| 156. | Adeptus Health Colorado Holdings LLC | 17-31448 | 30-0857912 |
| 157. | Atascocita 1960 Medical Center LLC | 17-31449 | 36-4780687 |
| 158. | Louetta Medical Center LLC | 17-31450 | 74-3178584 |
| 159. | First Texas Hospital Cy-Fair LLC | 17-31451 | 47-3480091 |
| 160. | Rosenberg Medical Center LLC | 17-31452 | 80-0964882 |
| 161. | Marrero Medical Center LLC | 17-31453 | 61-1753468 |
| 162. | Austin Brodie Medical Center LLC | 17-31454 | 61-1713294 |
| 163. | Adeptus Health Management LLC | 17-31455 | 32-0448472 |
| 164. | Baytown Medical Center LLC | 17-31456 | 30-0840445 |
| 165. | Meadowbrook Heights Medical Center LLC | 17-31457 | 32-0448039 |
| 166. | Medical Center of Crosby Lynchburg LLC | 17-31458 | 38-3922039 |
| 167. | Bella Terra Medical Center LLC | 17-31459 | 80-0957867 |
| 168. | Roy Richard Medical Center LLC | 17-31460 | 35-2491802 |
| 169. | Adeptus Health Phoenix Holdings LLC | 17-31461 | 35-2487075 |
| 170. | Medical Center of Spring Rayford Richards LLC | 17-31462 | 37-1747613 |
| 171. | San Antonio Nacogdoches Medical Center LLC | 17-31463 | 80-0937326 |
| 172. | Four Points Medical Center LLC | 17-31464 | 38-3938637 |
| 173. | Mesa Tierra Medical Center LLC | 17-31465 | 35-2523890 |
| 174. | Adeptus Health Ventures LLC | 17-31466 | 36-4802997 |
| 175. | San Tan Valley Medical Center LLC | 17-31467 | 36-4801184 |
| 176. | Bender's Landing Medical Center LLC | 17-31468 | 37-1752156 |
| 177. | Friendswood Medical Center LLC | 17-31469 | 38-3916132 |
| 178. | Midlothian Medical Center LLC | 17-31470 | 30-0802928 |
| 179. | ADPT Columbus Holdings LLC | 17-31471 | 36-4835265 |
| 180. | Seguin Foster Medical Center LLC | 17-31472 | 35-2532650 |
| 181. | Mountain Park Ranch Medical Center LLC | 17-31473 | 38-3939092 |
| 182. | FTH Houston Partners LLC | 17-31474 | 47-3466871 |
| 183. | Blacklick Woods Medical Center LLC | 17-31475 | 30-0805532 |
| 184. | Sienna Plantation Medical Center LLC | 17-31476 | 90-1009094 |
| 185. | Garland Centerville Medical Center LLC | 17-31477 | 35-2537960 |
| 186. | National Medical Professionals of Arizona LLC | 17-31478 | 37-1757007 |

| # | Debtor Name | Case No. | EIN |
|------|--|----------|------------|
| 187. | ADPT Houston Holdings LLC | 17-31479 | 30-0857977 |
| 188. | South Bend Medical Center LLC | 17-31480 | 61-1770288 |
| 189. | Gilbert Medical Center LLC | 17-31481 | 80-0940827 |
| 190. | Briar Forest-Eldridge Medical Center LLC | 17-31482 | 35-2481862 |
| 191. | National Medical Professionals of Ohio LLC | 17-31483 | 30-0829176 |
| 192. | South Carrier Medical Center LLC | 17-31484 | 32-0429602 |
| 193. | Gleannloch Farms Medical Center LLC | 17-31485 | 35-2481256 |
| 194. | ADPT New Orleans Holdings LLC | 17-31486 | 32-0479313 |
| 195. | South Green Oaks Medical Center LLC | 17-31487 | 90-1012518 |
| 196. | Broad Wagoner Medical Center LLC | 17-31488 | 35-2492252 |
| 197. | Glendale Medical Center LLC | 17-31489 | 90-1012820 |
| 198. | Goodyear Medical Center LLC | 17-31490 | 90-1007336 |
| 199. | Spanish Oaks Medical Center LLC | 17-31491 | 90-1012951 |
| 200. | Greenville Stacy Medical Center LLC | 17-31492 | 38-3926926 |
| 201. | ADPT New Orleans Management LLC | 17-31493 | Pending |
| 202. | Brushy Creek Medical Center LLC | 17-31494 | 38-3923792 |
| 203. | Spring 2920 Medical Center LLC | 17-31495 | 36-4776092 |
| 204. | Guadalupe River Medical Center LLC | 17-31496 | 35-2514826 |
| 205. | ADPT-AZ MPT Holdings LLC | 17-31497 | 61-1772047 |
| 206. | Camelback 83rd Medical Center LLC | 17-31498 | 38-3945993 |
| 207. | Hampden Tower Medical Center LLC | 17-31499 | 38-3928757 |
| 208. | Spring Green Medical Center LLC | 17-31500 | Pending |
| 209. | Helotes Medical Center LLC | 17-31501 | 36-4782313 |
| 210. | ADPT-AZ RE Holdings LLC | 17-31502 | 47-5241979 |
| 211. | SSH Medical Center LLC | 17-31503 | 77-0666943 |
| 212. | Hilliard Medical Center LLC | 17-31504 | 35-2491198 |
| 213. | Cedar Park Lakeline Medical Center LLC | 17-31505 | 35-2493773 |
| 214. | Sterling Ridge Medical Center II LLC | 17-31506 | 32-0439505 |
| 215. | Houston 9520 Jones Medical Center LLC | 17-31507 | 32-0432459 |
| 216. | ADPT-CO MPT Holdings LLC | 17-31508 | 47-3512571 |
| 217. | Centennial Medical Center LLC | 17-31509 | 32-0436930 |
| 218. | New Orleans East Medical Center LLC | 17-31510 | 61-1753435 |
| 219. | Houston FM 1960 Medical Center LLC | 17-31511 | 37-1783329 |
| 220. | ADPT-CO RE Holdings LLC | 17-31512 | 47-3565144 |
| 221. | Sterling Ridge Medical Center LLC | 17-31513 | 16-1711883 |
| 222. | Katy ER Center LLC | 17-31514 | 45-2583773 |
| 223. | Summerwood Medical Center LLC | 17-31515 | 30-0802964 |
| 224. | Center Street DP Medical Center LLC | 17-31516 | 35-2453223 |
| 225. | Keller Medical Center LLC | 17-31517 | 61-1736669 |
| 226. | Surprise Medical Center LLC | 17-31518 | 90-1012038 |
| 227. | ADPT-Columbus MPT Holdings LLC | 17-31519 | Pending |
| 228. | Kingwood Medical Center LLC | 17-31520 | 80-0684495 |
| 229. | Chandler Germann Medical Center LLC | 17-31521 | 80-0938469 |
| 230. | SW Chandler Medical Center LLC | 17-31522 | 90-1032288 |
| 231. | ADPT-Columbus RE Holdings LLC | 17-31523 | Pending |
| 232. | Kuykendahl Medical Center LLC | 17-31524 | 34-2028269 |
| 233. | Chandler Heights Medical Center LLC | 17-31525 | 32-0456525 |
| 234. | La Porte Medical Center LLC | 17-31526 | 80-0927953 |

| # | Debtor Name | Case No. | EIN |
|------|--|----------|------------|
| 235. | ADPT-DFW MPT Holdings LLC | 17-31527 | 81-0772445 |
| 236. | Sycamore School Medical Center LLC | 17-31528 | 35-2494277 |
| 237. | Cinco Ranch Medical Center LLC | 17-31529 | 61-1744313 |
| 238. | Lakewood Forest Medical Center LLC | 17-31530 | 90-1013791 |
| 239. | Tempe McClintock Baseline Medical Center LLC | 17-31531 | 38-3923748 |
| 240. | ADPT-DFW RE Holdings LLC | 17-31532 | 81-0785981 |
| 241. | ADPT-Houston MPT Holdings LLC | 17-31533 | 30-0914017 |
| 242. | Tempe Rural-Baseline Medical Center LLC | 17-31534 | 30-0852296 |
| 243. | Colonial Lakes Medical Center LLC | 17-31535 | 90-1004044 |
| 244. | ADPT-Houston RE Holdings LLC | 17-31536 | 61-1781468 |
| 245. | Texas Regional Hospital LLC | 17-31537 | 37-1753820 |
| 246. | Northwest Harris County Medical Center LLC | 17-31538 | 36-4781722 |
| 247. | Colorado General Hospital LLC | 17-31539 | 35-2506314 |
| 248. | Ohio General ER LLC | 17-31540 | 38-3918055 |
| 249. | Victory Lakes Medical Center LLC | 17-31541 | 37-1751372 |
| 250. | ADPT-LA MPT Holdings LLC | 17-31542 | 81-0752643 |
| 251. | Wadsworth-Belleview Medical Center LLC | 17-31543 | 35-2486458 |
| 252. | Conroe Medical Center LLC | 17-31544 | 37-1743660 |
| 253. | ADPT-LA RE Holdings LLC | 17-31545 | 81-0758384 |
| 254. | Waterside Medical Center LLC | 17-31546 | 36-4767886 |
| 255. | Ohio General Hospital LLC | 17-31547 | 80-0956267 |
| 256. | AJNH Medical Center LLC | 17-31548 | 36-4729524 |
| 257. | OpFree Licensing LP | 17-31549 | 01-0831027 |
| 258. | White Settlement Medical Center LLC | 17-31550 | 38-3970573 |
| 259. | Converse Medical Center LLC | 17-31551 | 30-0820305 |
| 260. | Wilderness-Hardy Oak Medical Center LLC | 17-31552 | 80-0954867 |
| 261. | Alamo Heights SA Medical Center LLC | 17-31553 | 35-2547715 |
| 262. | Copperwood Medical Center LLC | 17-31554 | 84-1697403 |
| 263. | William Cannon Medical Center LLC | 17-31555 | 35-2493839 |
| 264. | Algiers Medical Center LLC | 17-31556 | 32-0455775 |
| 265. | Creekside Forest Medical Center LLC | 17-31557 | 36-4781064 |
| 266. | OpFree RE Investments, Ltd. | 17-31558 | 06-1740727 |
| 267. | Culebra-Tezel Medical Center LLC | 17-31559 | 90-1020838 |
| 268. | De Zavala Medical Center LLC | 17-31560 | 30-0879734 |
| 269. | Alvin Medical Center LLC | 17-31561 | 90-1008817 |
| 270. | OpFree, LLC | 17-31562 | 34-2028263 |
| 271. | Dublin Medical Center LLC | 17-31563 | 80-0965351 |
| 272. | Anthem Medical Center LLC | 17-31564 | 37-1740119 |
| 273. | Eagles Nest Medical Center LLC | 17-31565 | 04-3847518 |
| 274. | Pearland 518 Medical Center LLC | 17-31566 | 90-1025398 |
| 275. | Pearland Parkway Medical Center LLC | 17-31567 | 51-0576704 |
| 276. | Pearland Sunrise Medical Center LLC | 17-31568 | 90-1001726 |
| 277. | Pflugerville Medical Center LLC | 17-31569 | 45-2552050 |
| 278. | Potranco Medical Center LLC | 17-31570 | 80-0966887 |
| 279. | Provinces Medical Center LLC | 17-31571 | 80-0967881 |
| 280. | Queen Creek Medical Center LLC | 17-31572 | 32-0457346 |