

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

IN RE:	§ CASE NO. 18-60526-RBK
	§
LITTLE RIVER HEALTHCARE HOLDINGS, LLC, ET AL.,	§ CHAPTER 11
	§
DEBTORS.¹	§ (JOINTLY ADMINISTERED)
	§
	§

**LIMITED OBJECTION
OF LITTLE RIVER HEALTHCARE – MERIDIAN SURGERY CENTER, LLC TO
DEBTORS’ MOTION FOR ENTRY OF INTERIM AND FINAL ORDERS TO USE
CASH COLLATERAL AND TO OBTAIN POST-PETITION FINANCING
(relates to Dkt Nos. 19, 58, 201 and 287)**

TO: THE HONORABLE RONALD B. KING,
UNITED STATES BANKRUPTCY JUDGE

Little River Healthcare – Meridian Surgery Center, LLC (“**Meridian**”) files this Limited Objection to Debtors’ Motion for Entry of Interim and Final Orders to Use Cash Collateral and to Obtain Post-petition Financing (“**Objection**”) as follows:

**I.
BACKGROUND**

The Rockdale-Meridian Relationship

1. Meridian is a Texas limited liability company and Debtor Rockdale Blackhawk, LLC (“**Rockdale**”) is a 51% equity member. The remaining 49% equity membership is collectively owned by four separate doctors or doctor groups, with KTMSC Holdings, LLC (“**KTMSC Holdings**”) being the second largest equity member at 23%. The daily operations of

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s feeral tax identification number, as applicable, are: Compass Pointe Holdings, LLC (1142), Little River Healthcare Holdings, LLC (7956), Timberlands Healthcare, LLC (1890), King’s Daughters Pharmacy, LLC (7097), Rockdale Blackhawk, LLC (0791), Little River Healthcare – Physicians of King’s Daughters, LLC (5264), Cantera Way Ventures, LLC (7815), and Little River Healthcare Management, LLC (6688). The Debtors’ mailing address is 1700 Brazos Ave., Rockdale, Texas, 76567.

Meridian is primarily maintained by KTMSC Management, LLC (“**KTMSC Management**”), although Rockdale retains some financial and tax reporting responsibilities. KTMSC Holdings and KTMSC Management are wholly owned by Dr. Kelly Tjelmeland, MD (“**Dr. Tjelmeland**”)(together with KTMSC Holdings and KTMC Management, the “**KTMSC Parties**”). Dr. Tjelmeland is one of two managers appointed for Meridian and he is also the appointed Medical Director for Meridian. The other manager is Jeff Madison, who is a principal of Rockdale and various other Debtors.

2. On September 1, 2013, Rockdale and Meridian entered into a Billing Services Agreement, which was amended on April 1, 2015 (the “**BSA**”). A true and correct copy of the original BSA and first amendment are attached hereto as *Exhibit 1*. Meridian, Rockdale and the KTMSC Parties are parties to several other structural and operational agreements, including, but not limited to, an Amended and Restated Management Services Agreement, Medical Director Services Agreement, and Surgical Services Agreement (collectively with the BSA, the “**Meridian Contracts**”).

3. Pursuant to the BSA, Rockdale would bill for medical services (“**Meridian Services**”) generated by Meridian through a non-Debtor Rockdale affiliate, SyneSource Management Group, LLC, using Rockdale’s payor identification.² All payments received from third party insurers on account of the Meridian Services (“**Meridian Funds**”) would be deposited in a Rockdale bank account with BBVA Compass. The Meridian Funds were often comingled with payments of other third party payors on account of services provided by Rockdale and other affiliates, although the payments made on account of Meridian Services could be easily identified by identification numbers and thereafter segregated.

² Meridian understands that Rockdale’s relationship with SyneSource may have changed with respect to the billing services, but the details are unknown.

4. Rockdale would account to Meridian for all Meridian Funds received on a weekly basis. The BSA allowed Rockdale to charge an 8% billing services fee, then transfer the remaining 92% of Meridian Funds to a Meridian-owned account. From there, Meridian would pay all allowed expenses from operations and the Meridian Contracts and then distribute the remaining profits to all Meridian members on a pro rata basis.

Rockdale Defaults on the BSA

5. In the summer and fall of 2017, Rockdale defaulted on the BSA by failing to properly account for and pay all Meridian Funds collected to Meridian, with the unpaid balance exceeding \$6.0 million at various points. There were also several discrepancies related to tax reporting that were not supported by adequate documentation.

6. The parties negotiated the dispute over the course of several months while Rockdale and the other Debtors financial troubles were increasing. These negotiations culminated in a confidential settlement agreement dated March 6, 2018 (“**Settlement Agreement**”). Rockdale performed under the Settlement Agreement for a period of time, but ultimately Rockdale defaulted.

7. The total unpaid balance due and owing to Meridian by Rockdale under the BSA as of the petition date, and taking into account pre-petition offsets, is \$2,442,917.13.³

Rockdale’s bankruptcy

8. On July 24, 2018, Debtors file their voluntary petitions for Chapter 11 bankruptcy relief (the “**Chapter 11 Cases**”).

9. As one of its First Day Motions, the Debtors filed their *Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to (A) Use cash Collateral on a Limited Basis*

³ The amount owed by Rockdale under the BSA in order to make the 49% non-Rockdale members whole as a result of Rockdale’s default is \$924,033.13, which may be subject to the application of additional received funds.

and (B) Obtain Post-Petition Financing on a Secured, Superpriority Basis, (II) Granting Adequate Protection , (III) Scheduling a Final Hearing, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief (Dkt. No. 19) (the “**DIP Financing Motion**”). The Debtors also filed their *Motion for Entry of Interim and Final orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash management Systems, (B) pay Any Prepetition or Postpetition Amounts Outstanding On Account of the Bank Fees, (C) Maintain Existing Business forms in the Ordinary Course of Business, and (D) Continue to Perform the Intercompany Transactions Consistent with Historical Practice, and (II) Granted Related Relief (Dkt No. 14)(“Cash Management Motion”)*.

10. First Day hearings were set for July 26, 2018. At the hearing, Meridian, derivatively by and through KTMSC Holdings, objected to the DIP Financing Motion and the Cash Management Motion. As a result, the parties agreed in open court, *inter alia*, to keep the status quo with respect to the Meridian Funds, notwithstanding the rights, remedies and other relief granted in the Interim DIP Financing Order (Dkt No. 58). A Second Interim DIP Financing Order was entered on September 4, 2018 (Dkt No. 201).

11. A final hearing on the DIP Financing Motion and the Cash Management Motion is set for September 27, 2018 at 2:00 pm

II. LIMITED OBJECTION

12. Meridian asserts a limited objection to the relief request in the DIP Financing Motion to the extent that anything in the Final DIP Financing Order purports to restrict the right of Meridian to assert its ownership and demand receipt of the Meridian Funds.

13. Pursuant to the BSA, the other Meridian Contracts, and the conduct of the parties in furtherance of these contacts, the Meridian Funds are owned by Meridian. Rockdale, as agent

of Meridian under the BSA, bills for and collects the Meridian Funds. The Meridian Funds are deposited by third party payors into one of Rockdale's operating accounts and Rockdale is then required to send 100% of the collected funds to a Meridian-owned bank account, less the permitted 8% billing services fee. As stated above, when Rockdale began experiencing cash flow shortages, it was collecting the Meridian Funds, but failing and refusing to deliver all of the required funds to Meridian in accordance with the BSA and the acceptable billing practices. It is also believed that Rockdale, without authority, continued to exercised dominion and control over the Meridian Funds and use them for its own purposes. Meridian subsequently asserted various claims under state law against Rockdale and other third parties for failure to remit the collected Meridian Funds. This dispute culminated in the Settlement Agreement, under which Rockdale performed for a period of time, but ultimately defaulted thereunder prior to the filing of its chapter 11 bankruptcy petition.

14. At the First Day hearings, Meridian objected to any DIP Financing Order and the Cash Management Order to the extent either order contains stipulations or requirements inconsistent with Meridians ownership of the Meridian Funds. Specifically, Meridian objected to provisions in the proposed DIP Financing Order that defines all cash in all of the Debtors' operating accounts to be Cash Collateral, subject to the security interests of Monroe Capital Management Advisors, LLC, as agent for the Pre-Petition and Post-Petition Lenders.⁴ Meridian also objected to any limitation on Meridian's ability to contest the ownership of the Meridian Funds, among other things.

15. The parties eventually agreed that the first Interim DIP Financing Order shall contain the following language:

⁴ As defined in the DIP Financing Motion.

Notwithstanding anything to the contrary in this Financing Order, prior to entry of a Final Order, the Debtors shall segregate and shall not transfer to the Agent any collections by Rockdale Blackhawk LLC on account of services performed by Little River Healthcare – Meridian Surgery Center LLC (“Meridian”). The Debtors are authorized to pay Meridian in accordance with the approved Budget. ***All rights of any parties, including without limitation, the Debtors, the Agent, the Lenders, and Meridian with respect to such segregated funds are reserved.*** Notwithstanding anything to the contrary in this Financing Order, prior to the entry of a Final Order, the Agent shall not be authorized to foreclose upon any equity interest of the Debtors in Meridian absent the consent of the requisite holders of interests in Meridian.

See Dkt No. 58, para. 106 (emphasis added). The Second Interim DIP Financing Order contained identical language. See Dkt No. 201 at para. 107. To date, Meridian has been receiving the Meridian Funds per these orders.

16. To the extent there is a continuing dispute between Meridian, the Debtors and Monroe as to the nature and use of the Meridian Funds and whether such funds constitute cash collateral of Monroe, and thereby subject to the terms of the Second Interim DIP Financing Order as such, that issue can only be resolved by the filing of an adversary proceeding under Bankruptcy Rule 7001(2).⁵ Any order of this Court pursuant to the DIP Financing Motion or the Cash Management Motion that purports to restrict, stipulate to, identify, limit, or alter the nature of the Meridian Funds is improper and without judicial authority.

17. To satisfy Meridian’s objection, the Final DIP Financing Order and the Final Cash Management Order should contain language consistent with Meridian’s rights identified herein, provide for the segregation of funds prior to any sweep of Debtors’ accounts and instruct the Debtors to pay Meridian in accordance with the BSA and customary practice.

⁵ Bankruptcy Rule 7001(2) requires an adversary proceeding for “a proceeding to determine the validity, priority, or extent of a lien or other interest in property, but not a proceeding under Rule 3012 [amount of secured claim] or Rule 4003(d)[exempt property].”

Respectfully submitted,

/s/ Duane J. Brescia
Duane J. Brescia (SBN 24025265)
Duane.Brescia@clarkhillstrasburger.com
CLARK HILL STRASBURGER
720 Brazos Street, Suite 700
Austin, Texas 78701-2974
Tel. 512.499.3600 /fax: 512.499.3660

**ATTORNEYS FOR CREDITOR
LITTLE RIVER HEALTHCARE - MERIDIAN
SURGERY CENTER, LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Limited Objection was served via CM/ECF to all parties entitled to such notice and mailed to counsel and parties listed on the service list attached as Exhibit A, via first class mail, postage prepaid, on this the 11th day of October, 2018

/s/ Duane J. Brescia
Duane J. Brescia

EXHIBIT
A

Waller Lansden Dortch & Davis, LLP
 Attn: Morris D. Weiss
 100 Congress Avenue, Suite 1800
 Austin, TX 78701

Texas Comptroller Of Public Accounts
 Revenue Accounting Division
 Bankruptcy Section
 Lyndon B. Johnson Office Building
 111 East 17th Street
 Austin, TX 78711

Centennial Bank
 620 Chestnut Street
 Conway, AR 72032

Waller Lansden Dortch & Davis, LLP
 Attn: Tyler N. Lane, Courtney K. Stone
 511 Union Street, Suite 2700
 Nashville, TN 37219

Texas Health and Human Services Commission
 Attn: J. Casey Roy
 Assistant Attorney General
 Bankruptcy & Collections Div.
 PO Box 12548-MC 008
 Austin, TX 78711-2548

Dell Financial Services L.L.C.
 Mail Stop-Ps2df-23
 One Dell Way
 Round Rock, TX 78682

United States Trustee
 Office of U.S. Trustee
 903 San Jacinto, Suite 230
 Austin, TX 78701

Texas State Board of Pharmacy
 William P. Hobby Building
 333 Guadalupe Street, Suite 3-500
 Austin, TX 78701

GE HFS, LLC
 PO Box 414
 W-490
 Milwaukee, WI 53201

Department of State Health Services
 Attn: Marc Connelly, Assistant General
 Counsel
 Office of General Counsel
 Austin, TX 78756-3199

Texas Workforce Commission
 TWC Building
 Regulatory Integrity Division
 101 East 15th Street
 Austin, TX 78778

GE HFS, LLC
 2 Bethesda Metro Center, Suite 600
 Bethesda, MD 20814

Internal Revenue Service
 Centralized Insolvency Office
 PO Box 7346
 Philadelphia, PA 19101-7346

General Electric Capital Corporation
 PO Box 414
 W-90
 Milwaukee, WI 53201

U.S. Department of Labor
 Office of the Chief Accountant
 200 Constitution Avenue N.W.
 Suite 400
 Washington, DC 20210

General Electric Capital Corporation
 901 Main Ave.
 Norwalk, CT 06581

Texas Attorney General's Office
 Bankruptcy-Collections Division
 300 W 15th Street
 Austin, TX 78701

United States Attorney General
 Department of Justice
 950 Pennsylvania Avenue, N.W.
 Washington, DC 20530

IBM Credit, LLC
 One North Castle Drive
 Armonk, NY 10504

Texas Attorney General's Office
 Attn: J. Casey Roy
 Assistant Attorney General
 Bankruptcy & Collections Div.
 PO Box 12548-MC 008
 Austin, TX 78711-2548

United States Attorney
 Civil Process Clerk
 601 N.W. Loop 410, Suite 600
 San Antonio, TX 78216

Med One Capital Funding, LLC
 and MB Financial Bank, N.A.
 10712 S. 1300 E
 Sandy, UT 84094

Texas Comptroller Of Public Accounts
 Revenue Accounting Division
 Bankruptcy Section
 PO Box 13528
 Capital Station
 Austin, TX 78711

Amerisourcebergen Drug Corporation
 1300 Morris Drive
 Chesterbrook, PA 19087

Monroe Capital Management Advisors, LLC
 as Administrative Agent
 311 S Wacker Dr., Suite 6400
 Chicago, IL 60606

Centennial Bank
 PO Box 2188
 Lubbock, TX 79408

Olympus America Inc.
 3500 Corporate Parkway
 Center Valley, PA 18034

Wells Fargo Bank, N.A.
 300 Tri-State International
 Suite 400
 Lincolnshire, IL 60069

Aramark Uniform Service Inc.
 Attn: Mike Fadden, President
 115 N First Street
 Burbank, CA 91502

Fujifilm Medical Systems
 419 West Avenue, Building 7
 Stamford, CT 06902-6300

Wells Fargo Financial Leasing, Inc.
800 Walnut, 4th Floor
Mac M0005-044
Des Moines, IA 50309

Ascend Professional Consulting, Inc.
Attn: Mark Swartz
1391 Calder Avenue Suite A
Beaumont, TX 77701

GA HC REIT II Temple MOB, LLC
62781 Collection Center Drive
Chicago, IL 60693-0627

Wells Fargo Vendor Financial Service,
LLC
PO Box 35701
Billings, MT 59107

Ascend Professional Consulting, Inc.
c/o Morgan Law Firm
Attn: John S. Morgan
2175 North Street, Suite 101
Beaumont, TX 77701

GE Healthcare Financial Services
PO Box 641419
Pittsburgh, PA 15264-1419

GE Healthcare #14456
500 W. Monroe Street
Chicago, IL 60661

Wells Fargo Vendor Financial Serv., LLC
800 Walnut Street
Des Moines, IA 50309

Xerox Financial Services LLC
45 Glover Avenue
Norwalk, CT 06856

BBL, LLC
Attn: Jim Church & Kevin Moore
dba BBL Construction Services LLC
302 Washington Ave Extension
Albany, NY 12203

GE Healthcare Financial Services
c/o Kutak Rock LLP Attn: Lisa Peters
The Omaha Building
1650 Farnam Street
Omaha, NE 68102-2186

Alcon Laboratories, Inc.
Attn: Jason Chavez
PNC Bank\Lockbox
3714 Solutions Center
Chicago, IL 60677

Central Texas Pathology Laboratory, P.A.
601 Hwy 6, Suite 111
Waco, TX 76710

Grant Thornton LLP
Attn: Tiffany Harper
33562 Treasury Center
Chicago, IL 60694-3500

Central Texas Urology
601 Hwy 6, Suite 105
Waco, TX 76710

Hing-Sheung Eugene Fung, M.D., PA
Eugene Fung MD & Alison Fung
611 W Highway 6 Suite 101
Waco, TX 76710

Alixpartners Holdings, LLP
2000 Town Center, Suite 2400
Southfield, MI 48075

American Express 1017
Attn: Shraddha Bharatia, Claims Admin
1105 Laurel Oak Rd. Suite 136
Voorhees, NJ 08043

Cerner Corporation
Attn: Mark C Elkins
2800 Rockcreek Parkway
Kansas City, MO 64117

Hing-Sheung Eugene Fung, M.D., P.A.
c/o Naman Howell Smith & Lee PLLC
Attn: Kerry Haliburton
400 Austin Ave Suite 800
Waco, TX 76701

Clinical Pathology Laboratories, Inc.
9200 Wall Street
Austin, TX 78754

American Express 1017
c/o Zwicker & Associates, P.C.
Attn: Daniel Moken
100 Corporate Woods, Ste. 230
Rochester, NY 14623

Computer Programs And Systems, Inc.
Evident LLC
6600 Wall Street
Mobile, AL 36695

Hologic Inc.
Attn: Cynthia Thiers
24506 Network Place
Chicago, IL 60673-1245

American Realty Capital
Healthcare Trust II
Operations Healthcare Trust, Inc.
Attn: Ar/Jonathan Dedellis
200 Dryden Rd, Suite 1100
Dresher, PA 19025

DML Sleep Diagnostics, LLC
14603 Huebner Road
Building 2
San Antonio, TX 78230

Jacobs Marketing, Inc.
17484 NW Freeway, Suite 276
Houston, TX 77040

Next Level Healthcare Consultants
47 South Wind Drive
Montgomery, TX 77356

Next Level Healthcare Consultants c/o
Roger G. Jain & Associates, P.C
Attn: Roger Jain
9301 SW Freeway, Ste. 250
Houston, TX 77074

Linebarger Goggan Blair & Sampson, LLP
(Counsel to Bexar County)
Attn: Don Stecker
711 Navarro Street, Ste. 300
San Antonio, TX 78205

Outreach Management Solutions, LLC dba True Health Outreach 6710 Research Rd, Suite 211 Frisco, TX 75033	Linebarger Goggan Blair & Sampson, LLP (Counsel to McLennan County & Limestone County Attn: Diane W. Sanders P.O. Box 17428 Austin, TX 78760-7428	Pharmerica Hospital Pharmacy Services, LLC dba Luker Pharmacy Attn: Bernard Richardson 1901 Campus Place Louisville, KY 40299
Dykema Gossett, LLC (Counsel to Salado Plaza, LLC) Attn: Aaron M. Kaufinan, Attn: Jane A. Gerber 1717 Main Street, Suite 4200 Dallas, TX 75201	Fishman Jackson Ronquillo PLLC (Counsel to Cerner Health Services, Inc.) Attn: Mark Ralston 13155 Noel Road, Suite 700 Dallas, TX 75240	McCreary, Veselka, Bragg & Allen, P.C. (Counsel to Bell TAD, et al. and County of Bastrop, Texas) Attn: Tara Leday P.O. Box 1269 Round Rock, TX 78680
Rev MD Partners, LLC 1111 Pasquinelli Drive Suite 400 Westmont, IL 60559	Sanofi Pasteur Attn: John Healey 12458 Collections Center Drive Chicago, IL 60693	Gray Reed & McGraw LLP (Counsel to Pharmerica Hospital Pharmacy Services, LLC) Attn: Jason S. Brookner, Attn: Amber M. Carson 1601 Elm Street, Suite 4600 Dallas, TX 75201
McGuire, Craddock & Strother, P.C. (Counsel to BBL Construction Services, LLC) Attn: J. Mark Chevalier 2501 N. Harwood, Suite 1800 Dallas, TX 75201	Sci Solutions 720 Third Avenue Suite 1000 Seattle, WA 98104	Haley & Olson, P.C. (Counsel to Bauer Brothers Investments, LLC) Attn: Blake Rasner 100 N. Ritchie Road, Suite 200 Waco, TX 76712
Mel Smith, Esq. (Counsel to Classic Bank, N.A.) 4201 Cypress Creek Parkway Suite 195 Houston, TX 77068	Shi International Corp Attn: Chi Nguyen 290 Davidson Avenue Somerset, NJ 08873	Naman, Howell, Smith & Lee, PLLC (Counsel to Hing-Sheung Eugene Fung, M.D., P.A.) Attn: Kerry L. Haliburton P.O. Box 1470 Waco, TX 76703-1470
Theracom, LLC Bayer Women's Healthcare LLC Attn: Claudia Friedman 3101 Gaylord Parkway Mail Stop: 2N-CI55 Frisco, TX 75034	Hunton Andrews Kurth LLP (Counsel to Boston Heart Diagnostics Corp.) Attn: Gregory G. Hesse Attn: Allison Jacobsen 1445 Ross Avenue, Suite 3700 Dallas, TX 75202-2799	United Biologics, LLC dba United Allergy Services 70 NE Loop 410, Suite 600 San Antonio, TX 78216
J. Scott Douglass (pro se) Attorney at Law 1811 Bering Dr., Suite 420 Houston, TX 77057	Perdue, Brandon, Fielder, Collins & Mott, L.L.P. (Counsel to Cameron Independent School District Attn: John T. Banks 3301 Northland Drive, Suite 505 Austin, TX 78731	Kay D. Brock (Counsel to Travis County) P.O. Box 1748 Austin, TX 78767
Ray Quinney & Nebeker, P.C. (Counsel to Med One Capital Funding, LLC) Attn: David H. Leigh 36 South State Street, 14th Floor Salt Lake City, UT 84111	Reed Smith LLP (Counsel to Blue Cross and Blue Shield of Texas) Attn: Lloyd A. Lim, Esq. Attn: Rachel I. Thompson, Esq. 811 Main Street, Suite 1700 Houston, TX 77002-6110	Sherry Law, LTD. (Counsel to Old Town Square, LLC) Attn: Keith Sherry, Esq. 3104 Barton Point Drive Austin, TX 78733
Sneed, Vine & Perry, P.C. (Counsel to River Place Estates, LLC) Attn: Charles L. Eppright 900 Congress Avenue, Suite 300 Austin, TX 78701	Stinson Leonard Street LLP (Counsel to Cerner Health Services, Inc.) Attn: Darrell Clark 1775 Pennsylvania Avenue NW, Suite 800 Washington, DC 20006-4605	Vinson & Elkins LLP (Counsel to Monroe Capital Management, LLC) Attn: William L. Wallander Trammell Crow Center 2001 Ross Avenue, Suite 3900 Dallas, TX 75201
Colonial Pacific Leasing Corporation 10 Riverview Drive Danbury, CT 06810	Haynes and Boone, LLP Counsel to GA HC REIT II Killeen MOB LLC Attn: Matthew T. Ferris 2323 Victory Avenue, Suite 700 Dallas, TX 75219	IBM Corporation Attn: Marie-Josée Dube 275 Viger East Montreal, QC H2X3R7 CANADA

Med One Capital Funding, LLC
c/o Ray Quinney & Nebeker, P.C.
Attn: David H. Leigh
36 South State Street, 14th Floor
Salt Lake City, UT 84111

Mesch, Clark & Rothchild, PC
Patient Care Ombudsman
Attn: Susuan N. Goodman
259 N. Meyer Avenue
Tucson, AZ 85701-1090

Norton Rose Fulbright US LLP
Attn: Michael M. Parker & Ryan E. Manns
Counsel to Official Committee of
Unsecured Creditors
300 Convent Street, Suite 2100
San Antonio, TX 78205

True Health Diagnostics LLC
Attn: Chris Grottenthaler
6170 Research Road, Suite 211
Frisco, TX 75033

Walsh Gallegos Trevino Russo & Kyle P.C.
Counsel to Rockdale ISD
Attn: Christina L. Garcia, P. Blake Henshaw
10375 Richmond Avenue, Suite 1357
Houston, TX 77042

Wells Fargo Bank, N.A.
300 Tri-State International
Suite 400
Lincolnshire, IL 60069

Porter Hedges LLP
Counsel to Brazos Valley Women Center, PA
Attn: Joshua W. Wolfshohl, Aaron J. Power
1000 Main Street, 36th Floor
Houston, TX 77002

Ruggero Law Firm PC
Counsel to Houston County Hospital District
Attn: Peter C. Rugero
1411 West Avenue, Suite 200
Austin, TX 78701

Savrick Schumann Johnson McGarr Kaminski &
Shirley, L.L.P
Counsel to Greenfield and Fortenberry, LLC
Attn: Mitchell D. Savrick
4330 Gaines Ranch Loop, Suite 150
Austin, TX 78735