

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

QUORUM HEALTH CORPORATION, *et al.*,

Debtors.¹

Chapter 11

Case No. 20-10766 (KBO)

Jointly Administered

Hearing Date:

June 16, 2020, at 9:30 a.m. (EDT)

**MUDRICK CAPITAL MANAGEMENT, L.P.'S
WITNESS LIST FOR COMBINED HEARING**

In accordance with paragraph 4 of the Stipulation Regarding Scheduling in Connection with Plan Confirmation Discovery and Trial, dated May 26, 2020 (ECF No. 410-1) (“Scheduling Order”), Mudrick Capital Management, L.P. (“Mudrick”) provides the following list of fact and expert witnesses that it intends to call or may call at the Combined Hearing.

Fact or Expert Witnesses Mudrick Will Call

1. Alfred Lumsdaine (Debtors)

Mr. Lumsdaine will be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) management and board compensation; (vii) Debtors' operations; and (viii) the reorganized company.

The last four digits of Quorum Health Corporation's tax identification number are 5208. Due to the large number of Debtors in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://dm.epiq11.com/Quorum>. The location of Quorum Health Corporation's corporate headquarters and the Debtors' service address is 1573 Mallory Lane, Brentwood, Tennessee 37027.

2. Paul Rundell (Alvarez and Marsal)

Mr. Rundell will be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) debtors-in-possession financing; and (vii) the reorganized company.

3. John Latina (Debtors) (Deposition Designation)

Mr. Latina will be called to testify regarding: (i) Debtors' financial reporting, budgeting, projections, and assets; and (ii) CARES Act funds and other government loans and grants.

4. Martin Smith (Debtors) (Deposition Designation)

Mr. Smith will be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) management compensation; and (vii) the reorganized company.

5. Austin Schneider (Alvarez and Marsal) (Deposition Designation)

Mr. Schneider will be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) debtors-in-possession financing; and (vii) the reorganized company.

6. Frank Walker (MTS) (Deposition Designation)

Mr. Walker will be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) management compensation; and (vii) the reorganized company.

7. Ruth Tabak (Berkeley Research Group, LLC)

Ms. Tabak will testify as an expert regarding CARES Act funds and other government loans and grants. Ms. Tabak will testify from Niskayuna, NY. No one will be in the room with her. She will have the following documents: (i) Expert Report of Ruth E. Tabak, dated June 7, 2020, and the materials considered or relied upon therein; and (ii) Expert Report of Bernard J. Ford, dated June 7, 2020, and the materials considered or relied upon therein.

8. Guy Davis (Protiviti)

Mr. Davis will testify as an expert regarding valuation of Debtors. Mr. Davis will testify from the offices of Protiviti, 1051 East Cherry Street, Suite 602, Richmond VA 23219 or from a residence in Baltimore, Maryland. No one will be in the room with him. He will have the following documents: (i) Expert Report of Guy Davis, dated June 7, 2020, and materials considered or relied upon therein; (ii) MTS Expert Valuation Report, dated June 7, 2020, and materials considered or relied upon therein; (iii) Protiviti Preliminary Solvency Assessment, dated April 28, 2020; (iv) MTS, Materials Prepared for the Office of the United States Trustee, dated April 16, 2020; (v) MTS, QHC Board Update, dated May 1, 2020; and (vi) MTS, QHC Board Update, dated May 8, 2020.

Fact or Expert Witnesses Mudrick May Call

9. Damon Work (Formos) (Deposition Designation)

Mr. Work may be called to testify regarding: CARES Act funds and other government loans and grants.

10. Suzanne Gibbons (DK Partners) (Deposition Designation)

Ms. Gibbons may be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) the reorganized company; (vii) Noteholder consideration and recovery; (viii) management compensation; and (ix) Mudrick's alternative plan.

11. David Magid (York Capital) (Deposition Designation)

Mr. Magid may be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) the reorganized company; (vii) Noteholder consideration and recovery; (viii) management compensation; and (ix) Mudrick's alternative plan.

12. Michael Rothbart (GoldenTree Asset Management) (Deposition Designation)

Mr. Rothbart may be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting,

budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) the reorganized company; (vii) Noteholder consideration and recovery; (viii) management compensation; and (ix) Mudrick's alternative plan.

13. Alice Schroeder (Debtors' Board of Directors) (Deposition Designation)

Ms. Schroeder will be called to testify regarding: (i) the consideration of alternative transactions and events leading to the bankruptcy filing; (ii) Debtors' financial reporting, budgeting, projections, and assets; (iii) valuation of Debtors; (iv) proposal and contents of the Disclosure Statement, Chapter 11 Plan, and agreements relating to the Chapter 11 filing; (v) CARES Act funds and other government loans and grants; (vi) management compensation; (vii) the reorganized company; and (viii) Mudrick's alternative plan.

Mudrick reserves the right to amend the list and to call additional witnesses and to add additional topics of inquiry to the witnesses listed above.

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Dated: June 13, 2020
Wilmington, Delaware

/s/ Brett S. Turlington

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