

**N SUIN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

PIONEER HEALTH SYSTEMS LLC, *et al.*¹

Debtors.

Chapter 11 (Subchapter V)

Case No. 24-10279 (JKS)

(Jointly Administered)

***FIFTH AMENDED*² NOTICE OF AGENDA FOR HEARING SCHEDULED
FOR AUGUST 1, 2024, AT 2:00 P.M. (ET), BEFORE THE
HONORABLE J. KATE STICKLES IN THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE**³

**THE HEARING WILL BE CONDUCTED IN-PERSON. ALL PARTICIPANTS,
INCLUDING ATTORNEYS INTENDING TO PRESENT AT THE HEARING AND
WITNESSES, MUST BE PHYSICALLY PRESENT IN THE COURTROOM.**

**PARTIES WISHING TO OBSERVE OR PARTICIPATE IN ACCORDANCE WITH
THE COURT'S CHAMBERS PROCEDURES MAY ATTEND REMOTELY OVER
ZOOM. ANY PARTY WISHING TO
APPEAR BY ZOOM MUST REGISTER BY
JULY 31, 2024 AT 4:00 P.M. (ET) AT THE LINK BELOW:**

<https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>

**AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A
CONFIRMATION EMAIL CONTAINING INFORMATION ABOUT JOINING THE
HEARING**

MATTERS GOING FORWARD

1. *Subchapter V Plan of Reorganization* [Filed 5/21/2024; [Docket No. 181](#)]

Objection Deadline: June 28, 2024 at 4:00 p.m. (ET)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their respective tax identification numbers, are as follows: Pioneer Health Systems LLC (4107), DOC LLC (0729), DOCTX3 PLLC (2604), PAS Services PLLC (8928), and DOC Corporate Group LLC (0970). The address of the Debtors' corporate headquarters is 3300 Dallas Pkwy, Suite 200, Plano, TX 75093.

² Amended items appear in bold and italics.

³ Copies of all petitions, motions, and pleadings identified herein may be obtained free of charge through the website of the Debtors' claims and noticing agent at: <https://dm.epiq11.com/case/pioneerhealth>

Responses/Objections Received: Informal comments from the Office of the United States Trustee, the Subchapter V Trustee, the United States Attorney for the District of Delaware, Realtynet TIC Investments, LLC, Texas Comptroller of Public Accounts, The County of Denton, Texas, The County of Williamson, Texas, Frisco Independent School District, Plano Independent School District, City of Carrollton, Dallas County, City of Frisco, Irving Independent School District, and Tarrant County.

- a) *Limited Objection And Reservation Of Rights To The Amended Subchapter V Plan Of Reorganization* [Filed 6/28/2024; [Docket No. 217](#)]
- b) *Objection Of Medport Billing, LLC And MSC Holding, LLC D/B/A Syndeocare To Amended Subchapter V Plan Of Reorganization* [Filed 6/28/2024; [Docket No. 218](#)]
- c) *Objection Of North Pointe Ventures, LLC To The Debtors' Amended Subchapter V Plan Of Reorganization* [Filed 6/29/2024; [Docket No. 219](#)]
- d) *Collin County Tax Assessor/Collector's Objection To The Debtors' Amended Subchapter V Plan Of Reorganization (Docket No. 185)* [Filed 6/28/2024; [Docket No. 220](#)]
- e) *Declaration Of Doris Pranicevic In Support Of Objection Of Medport Billing, LLC And MSC Holding, LLC D/B/A Syndeocare To Amended Subchapter V Plan Of Reorganization* [Filed 7/03/2024; [Docket No. 227](#)]
- f) *Declaration Of Michael Iglinski In Support Of Objection Of Medport Billing, LLC And MSC Holding, LLC D/B/A Syndeocare To Amended Subchapter V Plan Of Reorganization* [Filed 7/03/2024; [Docket No. 228](#)]

Related Documents:

- g) *Amended Subchapter V Plan of Reorganization* [Filed 5/30/2024; [Docket No. 185](#)]
- h) *Notice Of Filing Of Amended Subchapter V Plan Of Reorganization* [Filed 5/30/2024; [Docket No. 186](#)]
- i) *Order (I) Scheduling The Confirmation Hearing; (II) Establishing The Plan Objection And Voting Deadlines; (III) Approving The Form And Manner Of Notice Of The Confirmation Hearing And Related Documents; And (IV) Granting Related Relief* [Filed 5/31/2024; [Docket No. 188](#)]

- j) *Notice Of Hearing To Consider Confirmation Of Amended Subchapter V Plan Filed By The Debtors And Related Deadlines* [Filed 5/31/2024; [Docket No. 189](#)]
- k) *Plan Supplement* [Filed 6/22/2024; [Docket No. 215](#)]
- l) *Notice of Filing of Plan Supplement* [Filed 6/22/2024; [Docket No. 216](#)]
- m) *Second Amended Subchapter V Plan of Reorganization* [Filed 7/05/2024; [Docket No. 230](#)]
- i) **Objection Deadline for Modifications to Second Amended Subchapter V Plan of Reorganization:** July 19, 2024 at 4:00 p.m. (ET)
- ii) **Responses/Objections Received:** None.
- n) *Notice Of Filing Of Second Amended Subchapter V Plan Of Reorganization* [Filed 7/05/2024; [Docket No. 231](#)]
- o) *Notice Of Continued Hearing To Consider Confirmation Of Second Amended Subchapter V Plan Filed By The Debtors And Related Deadlines* [Filed 7/05/2024; [Docket No. 232](#)]
- p) *Declaration Of Emily Young, On Behalf Of Epiq Corporate Restructuring, LLC, Regarding Solicitation And Tabulation Of Ballots Cast On The Second Amended Subchapter V Plan Of Reorganization* [Filed 7/19/2024; [Docket No. 253](#)]
- q) *Brief In Support Of Confirmation Of Debtors' Second Amended Subchapter V Plan Of Reorganization* [Filed 7/22/2023; [Docket No. 255](#)]
- r) *Declaration Of Colin Chenault In Support Of Confirmation Of Debtors' Second Amended Subchapter V Plan Of Reorganization* [Filed 7/22/2024; [Docket No. 256](#)]
- s) *Declaration Of Alessandra Glorioso In Support Of Brief In Support Of Confirmation Of Debtors' Second Amended Subchapter V Plan Of Reorganization* [Filed 7/22/2024; [Docket No. 257](#)]
- t) *Notice Of Filing Of Proposed Findings Of Fact, Conclusions Of Law, And Order Confirming Second Amended Subchapter V Plan Of Reorganization* [Filed 7/22/2024; [Docket No. 258](#)]
- u) *Notice Of Filing Of Amended Exhibits To Second Amended Subchapter V Plan Of Reorganization* [Filed 7/22/2024; [Docket No. 259](#)]

- v) *Amended Plan Supplement* [Filed 7/22/2024; [Docket No. 260](#)]
- w) *Notice Of Filing Of Amendment To Plan Supplement* [Filed 7/22/2024; [Docket No. 261](#)]
- x) *North Pointe Ventures, LLC's Witness And Exhibit List For Hearing Set For July 25, 2024* [Filed 7/23/2024; [Docket No. 269](#)]
- y) *Medport Billing, LLC And MSC Holding, LLC d/b/a Syndeocare's Witness And Exhibit List For Hearing Scheduled July 25, 2024 At 10:00 A.M. ET* [Filed 7/23/2024; [Docket No. 270](#)]
- z) *Debtors' Witness And Exhibit List For Confirmation Hearing Set For July 25, 2024 At 10:00 A.M. (Prevailing Eastern Time)* [Filed 7/23/2024; [Docket No. 271](#)]
- aa) *David Hassinger's Witness And Exhibit List For The Hearing Set For July 25, 2024* [Filed 7/23/2024; [Docket No. 272](#)]
- bb) *Amended Debtors' Witness And Exhibit List For Confirmation Hearing Set For July 25, 2024 At 10:00 A.M. (Prevailing Eastern Time)* [Filed 7/24/2024; [Docket No. 284](#)]
- cc) *Notice of Filing of Amended Exhibits to Second Amended Subchapter V Plan Of Reorganization* [Filed 7/24/2024; [Docket No. 285](#)]
- dd) *Notice of Filing of Revised Proposed Findings of Fact, Conclusions of Law, and Order Confirming Second Amended Subchapter V Plan of Reorganization* [Filed 7/24/2024; [Docket No. 286](#)]
- ee) *Certification of Counsel Regarding Order Approving Stipulation for (I) Allowance of Claims of MSC Holding, LLC d/b/a Syndeocare and Medport Billing, LLC, (II) Withdrawal of Objection to Plan Confirmation, (III) Withdrawal of Motion to Remove Debtors as Debtors in Possession and to Appoint Subchapter V Trustee as Operating Trustee Pursuant to 11 U.S.C. 1189(a); and (IV) to Change Vote Rejecting the Plan to One Accepting the Plan* [Filed 7/24/2024; [Docket No. 287](#)]
- ff) *Second Amended Debtors' Witness and Exhibit List for Confirmation Hearing Set for July 25, 2024 at 10:00 a.m.* [Filed 7/24/2024; [Docket No. 288](#)]
- gg) *Supplemental Declaration Of Emily Young, On Behalf Of Epiq Corporate Restructuring, LLC, Regarding Solicitation And Tabulation Of Ballots Cast On The Second Amended Subchapter V Plan Of Reorganization* [Filed 7/25/2024; [Docket No. 290](#)]

Status: This matter is going forward. The Debtors propose to move forward with a 363 sale process prior to the Effective Date of the Plan and are working to revise the Sale Procedures in light of that approach. The Debtors have filed a sperate motion to approve additional DIP financing to provide the Debtors with additional liquidity to continue operating through the 363 sale process. The Debtors will request confirmation of the Plan with certain nonmaterial revisions incorporated into the Confirmation Order to implement this change.

2. *Amended Motion Of The Debtors For Entry Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief* [Filed 7/31/2024; [Docket No. 309](#)]

Objection Deadline: August 1, 2024, at 2:00 p.m. (ET)

Responses/Objections Received: None.

Related Documents:

- a) *Motion Of The Debtors For Entry Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief* [Filed 7/30/2024; [Docket No. 307](#)]
- b) *Declaration of Colin Chenault in Support of Motion Of The Debtors For Entry Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief* [Filed 7/31/2024; [Docket No. 308](#)]
- c) *Amended Declaration of Colin Chenault in Support of Motion Of The Debtors For Entry Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing;*

And (VI) Granting Related Relief [Filed 7/31/2024; [Docket No. 310](#)]

- d) *Debtors' Motion for Order Shortening Notice of Hearing on Amended Motion Of The Debtors For Entry Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief* [Filed 7/31/2024; [Docket No. 311](#)]
- e) ***Exhibit(s) / Notice of Filing of Amended Motion Of The Debtors For Entry Of Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Additional Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief*** [Filed 7/31/2024; [Docket No. 313](#)]
- f) *Order Shortening Notice of Hearing on Amended Motion Of The Debtors For Entry Final Order Pursuant To 11 U.S.C. §§ 105, 361, 362, 363, 364, 503, And 507 (I) Authorizing The Debtors To Obtain Senior Secured Superpriority Postpetition Financing; (II) Granting Liens And Superpriority Administrative Expense Claims; (III) Authorizing Use Of Cash Collateral; (IV) Modifying The Automatic Stay; (V) Scheduling A Final Hearing; And (VI) Granting Related Relief* [Filed 7/31/2024; Docket No. ____]

Status: This matter is going forward.

Dated: July 31, 2024
Wilmington, Delaware

DORSEY & WHITNEY (DELAWARE) LLP

/s/ Eric Lopez Schnabel

Eric Lopez Schnabel (DE Bar No. 3672)

Alessandra Glorioso (DE Bar No. 5757)

300 Delaware Avenue, Suite 1010

Wilmington, Delaware 19801

Telephone: (302) 425-7171

Email: schnabel.eric@dorsey.com

glorioso.alessandra@dorsey.com

-and-

DORSEY & WHITNEY LLP

Matthew Olson (*pro hac vice*)

167 Hamilton Avenue, Suite 200

Palo Alto, CA 94301

Telephone: (650) 857-1717

Email: olson.matt@dorsey.com

Counsel for the Debtors and Debtors in Possession