

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

----- In re: CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al., ¹ <div style="text-align: center;">Debtors.</div> -----	x : : : : : : : v	Chapter 11 Case No. 24-12534 (JKS) (Joint Administration Requested)
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**AMENDED² NOTICE OF AGENDA OF FIRST DAY MATTERS SCHEDULED FOR
HEARING ON NOVEMBER 6, 2024 AT 3:00 P.M. (ET)³**

This proceeding will be conducted **Hybrid Live/ Zoom**.
Please refer to Judge Stickles' Chambers Procedures
(<https://www.deb.uscourts.gov/content/judge-j-kate-stickles>) and the Court's website
(<http://www.deb.uscourts.gov/ecourt-appearances>) for information on the method of allowed
participation (video or audio), Judge Stickles' expectations of remote participants, and the
advance registration requirements.

The deadline to register for remote attendance at **first-day** or emergency hearings is
one-hour prior to the hearing (Prevailing Eastern Time) unless otherwise noticed.
using the *eCourtAppearances* tool available on the Court's website.

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All amendments are highlighted in **bold**.

³ All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

Involuntary Petition

1. **Involuntary Petition of IJKG Opco, LLC (24-12551) [Filed: 11/03/2024, D.I. [1](#)].**

Related Documents:

- A. **Answer of IJKG Opco LLC to Involuntary Petition [Filed: 11/3/2024, D.I. [2](#)].**
- B. **Notice of Filing of Resolution Authorizing consent to Entry of An Order for Relief [Filed: 11/05/2024, D.I. [5](#)].**
- C. **Proposed Order for Relief.**

Status: Debtor IJKG Opco LLC requests the Court to enter the Order for Relief.

First Day Declaration

2. Declaration of Shamiq Syed, in Support of Debtors' Chapter 11 Petitions and First Day Motions [Filed: 11/04/2024, D.I. [23](#)].

Status: The Debtors will ask the Court to admit the declaration into evidence. To the extent the Court or any party in interest have questions regarding the declaration or the factual basis for the first-day relief the Debtors seek, the declarant will be available in person.

Administrative Motions

3. Motion of the Debtors for Entry of an Order Directing Joint Administration of Their Chapter 11 Cases [Filed 11/03/2024, D.I. [4](#)].

Status: This matter is going forward.

4. Debtor's Application for Entry of an Order (I) Approving the Retention and Appointment of Epiq Corporate Restructuring, LLC as the Claims and Noticing Agent to the Debtors and (II) Granting Related Relief [Filed 11/04/2024, D.I. [22](#)].

Status: This matter is going forward.

5. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to File a Consolidated List of the Debtors' Thirty Largest Unsecured

Creditors and (II) Establishing Patient Notice Procedures [Filed 11/03/2024, D.I. [5](#)].

Status: This matter is going forward with respect to an interim order.

6. Motion of Debtors for Interim and Final Order Approving Certain Procedures to Maintain the Confidentiality of Patient Information as Required by Applicable Privacy Rules [Filed 11/03/2024, D.I. [6](#)].

Status: This matter is going forward with respect to an interim order.

First Day Motions Pertaining to Operations

7. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing, But Not Directing, the Debtors to (A) Pay Prepetition Employee Wages, Salaries, Other Compensation, and Reimbursable Employee Expenses and (B) Continue Employee Benefits Programs; and (II) Granting Related Relief [Filed 11/04/2024, D.I. [12](#)].

Status: This matter is going forward with respect to an interim order.

8. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Continue Their Insurance Policies Entered into Prepetition and Pay Prepetition Obligations in Respect Thereof, (B) Honor Prepetition Premium Financing Agreement, and (C) Renew Insurance Premium Financing Agreement in the Ordinary Course of Business; (II) Authorizing Banks to Honor and Process Check and Electronic Transfer Requests Related Thereof; and (III) Granting Related Relief [Filed 11/04/2024, D.I. [13](#)].

Status: This matter is going forward with respect to an interim order.

9. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Continued Use of the Debtor's Cash Management System and Existing Bank Accounts, (II) Authorizing Continued Intercompany Transfers Among Debtors Entities and (III) Granting Related Relief [Filed 11/03/2024, D.I. [7](#)].

Status: This matter is going forward with respect to an interim order.

10. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service and (IV) Granting Related Relief [Filed 11/03/2024, D.I. [8](#)].

Status: This matter is going forward with respect to an interim order.

11. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Claims of Patient Care Vendors and (II) Granting Related Relief [Filed 11/04/2024, D.I. [14](#)].

Status: This matter is going forward with respect to an interim order.

12. Motion for Interim and Final Orders (I) Authorizing the Debtors to Pay Certain Prepetition Taxes and (II) Granting Related Relief [Filed 11/03/2024, D.I. [9](#)].

Status: This matter is going forward.

DIP Financing Motions

13. Motion of CarePoint Health Systems, Inc. for Entry of Interim and Final Orders: (I) Authorizing Debtors to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (V) Authorizing Debtors to Use Cash Collateral [Filed 11/03/2024, D.I. [10](#)].

Status: This matter is going forward with respect to an interim order.

14. Motion of IJKG OPCO, LLC and IJKG, LLC for Entry of Interim and Final Orders: (I) Authorizing IJKG Opco, LLC and IJKG, LLC to Obtain Temporary and Permanent Post-Petition Financing from Bayonne Medical Center Opco, LLC Pursuant to Sections 363 and 364 of the Bankruptcy Code; (II) Granting Administrative Priority Claims to DIP Lender Pursuant to Section 364 of the Bankruptcy Code; (III) Modifying the Automatic Stay to Implement the Terms of the DIP Order; and (IV) Authorizing the Use of Cash Collateral [Filed 11/03/2024, D.I. [11](#)].

Status: This matter is going forward with respect to an interim order.

15. Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 11/04/2024, D.I. [18](#)].

Status: This matter is going forward with respect to an interim order.

16. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 11/04/2024, D.I. [19](#)].

Status: This matter is going forward with respect to an interim order.

Dated: November 5, 2024

DILWORTH PAXSON LLP

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