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November 22, 2024

The Honorable J. Kate Stickles
United States Bankruptcy Court, District of Delaware
824 Market Street
Wilmington, DE 19801

RE: CarePoint Health Systems, Inc., et al., Case No. 24-12534

Dear Judge Stickles:

We represent debtors in the above-captioned matter. This letter responds to the November 20, 2024, letter of counsel to Strategic Ventures, LLC. requesting a discovery conference. Strategic Ventures' request for a discovery conference is premature. The debtors have committed to act in good faith to respond to Strategic Ventures' document requests by the requested date of November 27, 2024. Debtors continue to believe that the vast majority, if not all, responsive documents will be produced by that date. With respect to objections, the debtors only intend to object to Document Request No. 9, which seeks "[d]ocuments concerning any efforts maintain and preserve the Collateral during the Relevant Period" as being vague, overbroad and unduly burdensome.

Respectfully,

Peter C. Hughes

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