

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

In re:	§	Chapter 7
LITTLE RIVER HEALTHCARE	§	
HOLDINGS, LLC, <i>et al.</i> ¹	§	CASE NO. 18-60526-RBK
	§	
Debtors.	§	(Jointly Administered)

**SECOND SUPPLEMENT TO MOTION TO
APPROVE COMPROMISE AND SETTLEMENT, INCLUDING
FREE AND CLEAR ASSIGNMENT OF THE ASSIGNED CLAIMS**

James Studensky, in his capacity as Chapter 7 Trustee of Little River Healthcare Holdings, LLC (“Trustee”), files this Second Supplement (“Second Supplement”) to his *Motion to Approve Compromise and Settlement Including Free and Clear Assignment of the Assigned Claims* (“9019 Motion”) [Docket No. 1506].

1. On January 17, 2025, the Trustee filed his 9019 Motion, seeking to approve a settlement agreement with Blue Cross (the “Settlement”).

2. On January 21, 2025, UnitedHealthcare Insurance Company and UnitedHealthcare of Texas, Inc. (“United”) filed its *Preliminary Objection to Motion to Approve Compromise and Settlement* (“Objection”) [Docket No. 1511] and a subsequent Supplemental *Objection to the Trustee’s Motion to Approve Compromise and Settlement and Request for an Accounting* (“Supplemental Objection”) [Docket No. 1517].

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal 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 Avenue, Rockdale, Texas 76567.

3. On January 27, 2025, Ryan Downton, the Law Offices of Ryan Downton, and Peggy Borgfeld filed their *Objection to the Trustee's Motion to Approve Compromise and Settlement and Request for an Accounting* ("Downton Objection") [Docket No. 1518].

4. By way of update, since the Court last held a hearing on the 9019 Motion, the Trustee and Blue Cross have not yet reached an agreement as to a revised form of Settlement. The Trustee and Blue Cross are still engaged in such discussions and negotiations. The Trustee will request a short reset of the 9019 Motion.

Date: January 30, 2025

/s/ Jennifer F. Wertz

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Special Counsel to James Studensky Chapter 7 Trustee

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January 2025, a true and correct copy of the foregoing was served via the Court's CM/ECF electronic notification system and via electronic and regular mail on the parties listed below, and via regular mail on the parties included on the attached mailing list:

<p>Little River Healthcare Holdings, LLC Attn: Ronald Winters, Restructuring Officer 1700 Brazos Ave Rockdale, Texas 76567 rwinters@hcmpllc.com</p>	<p>Office of the United States Trustee Attn: Shane P. Tobin 003 San Jacinto, Room 230 Austin, TX 78701 Shane.P.Tobin@usdoj.gov</p>
<p>Vince & Elkins, LLP Attn: Bill Wallander, Matt Pyeatt Bradley Foxman Trammell Crow Center 2001 Ross Avenue, Suite 3700 bwallander@velaw.com mpyeatt@velaw.com bfoxmann@velaw.com <i>Attorneys for Monroe Capital Management Advisors, LLC</i></p>	<p>Morris D. Weiss Holland & Knight 100 Congress Ave, Suite 1800 Austin, Texas 78701 Morris.Weiss@hklaw.com <i>Debtors' Counsel</i></p>
<p>James Studensky Chapter 7 Trustee 3912 West Waco Dr. Waco, Texas 76710 jstudensky.trustee@outlook.com</p> <p>Max Ciccarelli Ciccarelli Law Firm 100 N. 6th Street, Suite 502 Waco, TX 76701 max@ciccarellilawfirm.com</p> <p>Eric S. Goldstein Shipman & Goodwin LLP One Constitutional Plaza Hartford, CT 06103 egoldstein@goodwin.com</p>	<p>Brian P. Kavanaugh Scott D. Stein Tacy F. Flint Joseph R. Dosch Jaime R. Simon Jonathan Dussik Meredith Greene Jalali Thomas D. Hoyt Sidley Austin LLP One South Dearborn St. Chicago, IL 60603 bkavanaugh@sidley.com sstein@sidley.com tflint@sidley.com jdosch@sidley.com jaime.simon@sidley.com jdussik@sidley.com meredith.jalali@sidley.com thoyt@sidley.com</p>

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/s/ Jennifer F. Wertz
Jennifer F. Wertz