

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

In re:

PIONEER HEALTH SYSTEMS LLC, *et. al.*<sup>1</sup>

Debtors.

Chapter 11 (Subchapter V)

Case No. 24-10279 (JKS)

(Jointly Administered)

**NOTICE OF TERMINATION OF SALE PROCESS**

**PLEASE TAKE NOTICE** that, pursuant to the Court’s *Findings of Fact, Conclusions of Law, and Order Confirming Second Amended Subchapter V Plan of Reorganization* filed December 20, 2024 [Docket No. 477], confirming the *Second Amended Subchapter V Plan of Reorganization* [Docket No. 230] (the “Confirmed Plan”) of the debtors and debtors-in-possession in the above-captioned cases (the “Debtors”), the Debtors set forth certain procedures (the “Post-Confirmation Sale Procedures”) related to the proposed sale of substantially all of the Debtors’ assets.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Post-Confirmation Sale Procedures, an auction was held on February 3, 2025, and February 4, 2025. The Debtors considered proposals from Kiron Capital, LLC for a purchase of the Debtors’ assets, and proposals from Bonito Kitty LLC and certain holders of allowed general unsecured claims<sup>2</sup> to conditionally subordinate their claims to other allowed general unsecured claims in the event the Debtors

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<sup>1</sup> 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.

<sup>2</sup> The holders of the subordinating general unsecured claims are James Griffin, Dr. David Hassinger, Dr. Sean Hassinger, Keeping it Real Estate LLC, and Dr. Merritt Pember and their allowed general unsecured claims total \$9,456,330.25.

reorganize under the Confirmed Plan without executing a sale (the “Proposed Subordination”). The Debtors fully evaluated the proposals and considered the totality of the circumstances surrounding the proposals, including consideration of the various factors identified in the Post-Confirmation Sale Procedures.

**PLEASE TAKE FURTHER NOTICE** that, after considering the proposals presented to them and consulting with the Subchapter V Trustee and their professionals, the Debtors determined that executing a sale is not in the best interests of the Debtors, their estates, and their stakeholders.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with the Post-Confirmation Sale Procedures, the sale process under the Plan was terminated without selection of a Prevailing Bid (as defined in the Plan), and that the Debtors will proceed with their reorganization under the terms of the Confirmed Plan and will implement the Proposed Subordination as part of the Confirmed Plan.

Dated: February 4, 2025  
Wilmington, Delaware

**DORSEY & WHITNEY (DELAWARE) LLP**

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