

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

In re:	)	
	)	Chapter 11 (Subchapter V)
	)	
PIONEER HEALTH SYSTEMS LLC, <i>et</i>	)	Case No. 24-10279 (JKS)
<i>al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

**NOTICE OF SERVICE OF NOTICES OF DEPOSITION SERVED FEBRUARY 28, 2025**

**PLEASE TAKE NOTICE** that, on February 28, 2025, Kiron Capital LLC, by and through its undersigned counsel, caused the attached (i) *Notice of 30(b)(6) Deposition Directed to Debtors* (attached here as **Exhibit A**), and (ii) *Notice of Deposition of Colin Chenault* (attached here as **Exhibit B**) to be served via electronic mail upon the following counsel for the Debtors:

Alessandra Glorioso  
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**PLEASE FURTHER NOTICE** that, on February 28, 2025, Kiron Capital LLC, by and through its undersigned counsel, caused the *Amended Notice of Deposition of David Hassinger*

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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.

(attached here as **Exhibit C**) to be served via electronic mail upon the following counsel for David Hassinger.

Ericka Johnson  
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Dated: March 3, 2025  
Wilmington, Delaware

/s/ Michael S. Neiburg  
Ryan M. Bartley (No. 4985)  
Michael S. Neiburg (No. 5275)  
Joseph M. Mulvihill (No. 6061)  
Christopher M. Lambe (No. 6846)  
**YOUNG CONAWAY STARGATT & TAYLOR, LLP**  
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*Counsel to Kiron Capital, LLC*

# **EXHIBIT A**

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

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In re:

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

Debtors.

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)  
) Chapter 11 (Subchapter V)  
)  
) Case No. 24-10279 (JKS)  
)  
) (Jointly Administered)  
)  
)

**NOTICE OF 30(b)(6) DEPOSITION DIRECTED TO DEBTORS**

**PLEASE TAKE NOTICE** that, pursuant to Rules 26 and 30(b)(6) of the Federal Rules of Civil Procedure (the “Rules”), as made applicable by Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure, Kiron Capital, LLC and its wholly owned subsidiaries Doc Management Services, LLC, and Confidas Orthopedic & Spine, PLLC (collectively, “Kiron”), will take a Rule 30(b)(6) deposition (the “30(b)(6) Deposition”) upon oral examination of such person or persons designated by the above-captioned Debtors regarding the subject matters set forth in the attached Schedule A, in connection with *Kiron Capital, LLC’s (A) Objection to the Sale Motion and (B) Motion Requesting Orders (I) Setting a Status Conference, (II) Enforcing the Plan and Post-Confirmation Sale Procedures, and (III) Granting Related Relief* [Docket No. 562].

**PLEASE TAKE FURTHER NOTICE** that the Rule 30(b)(6) Deposition shall take place remotely via video conferencing on March 7, 2025, at 1:00 P.M. Eastern Standard Time and shall continue from day to day until completed. A video link will be provided prior to the deposition to give all interested parties who are permitted to observe or participate in such deposition adequate notice and opportunity to do so by phone and/or video.

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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.

**PLEASE TAKE FURTHER NOTICE** that the Rule 30(b)(6) Deposition will be taken pursuant to all applicable rules of the Court before a notary public or other such person authorized by law to administer oaths. The deposition will be recorded by stenographic means and may also be recorded by sound and visual means, including means for the instant display of testimony on computer.

Dated: February 28, 2025  
Wilmington, Delaware

/s/ Christopher M. Lambe

Ryan M. Bartley (No. 4985)

Michael S. Neiburg (No. 5275)

Joseph M. Mulvihill (No. 6061)

Christopher M. Lambe (No. 6846)

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

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*Counsel to Kiron Capital, LLC, Doc Management Services, LLC, and Confidas Orthopedic & Spine, PLLC*

**Schedule A**

## DEFINITIONS

1. “Auction” shall refer to the auction conducted on February 4, and February 5, 2025, as defined in the Confirmed Plan.
2. “Chapter 11 Proceedings” means *In re: Pioneer Health Systems LLC et al.*, Case No. 24-10279 (JKS), filed in the Court.
3. “Communication” or “communication” means all oral, written, electronic or other means of transmission or exchange of information, including correspondence, packages, statements, admissions, denials, inquiries, discussions, conversations, meetings, telephone calls, text messages, seminars, conferences, messages, e-mails, negotiations, agreements, contracts, understandings, meetings, facts, ideas, statistics, evidence, details, notes, background, or other forms of information. For the avoidance of doubt, Communications shall also include Your internal Communications.
4. “Concern,” “evidence,” “refer,” “relate to,” “concerning,” “evidencing,” “referring,” or “relating to” any given subject means all Documents which assess, concern, constitute, contain, describe, discuss, embody, evidence, identify, record, reflect, regard, show, state, or refer or relate, directly or indirectly, in any way, to the subject matter identified.
5. “Court” means the United States Bankruptcy Court for the District of Delaware.
6. “Confirmed Plan” shall refer to the *Second Amended Subchapter V plan of Reorganization* [Docket No. 230].
7. “Disposable Income Fund” shall have the meaning ascribed to it in the Confirmed Plan.
8. “Eminent Services Agreement” shall mean the Amended and Restated Administrative Services Agreement by and between Eminent Medical Center Operating, LLC, and Pioneer Health Systems, LLC, dated September 23, 2024.

9. “Include” or “including” means including, but not limited to.
10. “Insider Proposal” shall refer to the modification to the Confirmed Plan or transaction proposed by the Noteholder Group, which purports to include \$18,999,999.76 from the proceeds of the Debtors’ business operations over a three-year, and five-year period.
11. “Kiron” shall refer to Kiron Capital, LLC.
12. “Kiron Bids” shall include the Kiron Cash Bid and Kiron Final NPV Bid.
13. “Kiron Cash Bid” shall refer to Kiron’s January 12, 2025 bid valued at \$15,750,000.
14. “Kiron Final NPV Bid” shall refer to Kiron’s February 4, 2025 bid valued at \$22,229,000.
15. “Noteholder Group” shall include David Hassinger, Sean Hassinger, Merritt Pember, James Griffin, and Keeping It Real Estate, LLC.
16. “Objection” shall refer to Kiron’s *(A) Objection to the Sale Motion and (B) Motion Requesting Orders (I) Setting a Status Conference, (II) Enforcing the Plan and Post-Confirmation Sale Procedures, and (III) Granting Related Relief* [Docket No. 562].
17. “Original Projections” shall refer to Your financial projections from 2024 to 2030 as reflected on Exhibit C to the Confirmed Plan.
18. “Person” means any natural person, corporation, partnership, proprietorship, limited liability company, association, joint venture, firm or other business enterprise or legal entity in whatever form, and shall be construed as both singular and plural.
19. “Revised Projections” shall refer to Your financial projections from 2024 to 2030 as reflected on Exhibit 1 to Your *Notice of Filing of Amended Exhibit to Second Amended Subchapter V plan of Reorganization* [Docket No. 559].

20. “Sale Procedures” shall mean the marketing and sale process provided in the *Post-Confirmation Sale Procedures* [Docket No. 342-2].

21. “Sale Process” shall mean the post-confirmation marketing and sale process conducted by You and/or Your professional advisors as provided in the Sale Procedures.

22. “You” or “Your” or “Debtors” shall collectively refer to Pioneer Health Systems LLC, DOC LLC, DOCTX3 PLLC, PAS Services PLLC, and DOC Corporate Group LLC, and any of Your officers, directors, managers, attorneys, or professional advisors. For the avoidance of doubt, “You,” “Your” or “Debtors” shall include Debtors’ counsel and the Debtors’ professional advisors at Provident Healthcare Partners, LLC.

#### **DEPOSITION TOPICS**

1. Your audited and unaudited financial statements and statements of monthly cash flows for fiscal years 2023, 2024, and 2025.

2. Your financial projections, estimates of monthly cash flows, and business plans for fiscal years 2023, 2024, 2025, 2026, 2027, 2028, and 2029.

3. Your appointments by service line by location for fiscal years 2023, 2024, and 2025.

4. The facility services agreement in place with Eminent Medical Center Operating, LLC prior to the execution of the Eminent Services Agreement.

5. The Eminent Services Agreement, including the facts and circumstances concerning the execution of the agreement and the actual, estimated or anticipated monthly and annual cash flows and earnings in connection with the Eminent Services Agreement.

6. The Original Projections and Revised Projections, including (i) the assumptions underlying the projections, (ii) the facts and circumstances regarding the preparation of the Revised Projections, (iii) the reason(s) why You decided to prepare the Revised Projections, (iv) the data and evidence that support any increase in projected volume and profitability of physical

therapy and surgical procedures versus Your historical average, (v) the assumptions that support changes in projected capital expenditures versus Your historical average, and (vi) the relationship between the growth of revenues and the cost of revenues.

7. The Sale Procedures and the Sale Process.

8. The facts and circumstances regarding the Auction, including the conduct of the Auction, Communications with any bidders or potential bidders, and the reason(s) why You determined that the Auction should be held.

9. The Kiron Bids, including any Communications with professionals at Provident Healthcare Partners, LLC concerning any of the Kiron Bids, Your analysis regarding any of the Kiron Bids, and Your understanding or beliefs concerning Kiron's ability to close on any transaction pursuant to the Kiron Bids.

10. The facts and circumstances regarding the Insider Proposal, including any Communications with professionals at Provident Healthcare Partners, LLC regarding the Insider Proposal, Your analysis of the Insider Proposal, and the reason(s) why You determined the Insider Proposal was in the best interests of the Debtors' creditors and other stakeholders.

11. Any Communications with David Hassinger or any other member of the Noteholder Group concerning the Sale Process, the Auction, any of the Kiron Bids, and/or the Insider Proposal.

12. The facts and circumstances regarding Your decision to reject any of the Kiron Bids at or prior to the Auction, including the reason(s) why You determined to reject any of the Kiron Bids, and any analysis comparing the Kiron Bids with the Insider Proposal.

13. The Disposable Income Fund as identified in (i) the Original Projections and (ii) the Revised Projections, including its source of funding.

14. The facts and circumstances related to the selection and appointment of Ted Gavin as the Debtors' independent manager, including (i) Mr. Gavin's purpose, mandate, or scope of authority, (ii) the formation of the restructuring committee, (iii) board resolutions, minutes, or other governance regarding (i) and (ii) above.

# **EXHIBIT B**

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

In re:	)	
	)	Chapter 11 (Subchapter V)
	)	
PIONEER HEALTH SYSTEMS LLC, <i>et</i>	)	Case No. 24-10279 (JKS)
<i>al.</i> , <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

**NOTICE OF DEPOSITION OF COLIN CHENAULT**

**PLEASE TAKE NOTICE** that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, as made applicable by Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure, Kiron Capital, LLC and its wholly owned subsidiaries Doc Management Services, LLC, and Confidas Orthopedic & Spine, PLLC (collectively, “Kiron”), will take the deposition upon oral examination of Colin Chenault in connection with the *Kiron Capital, LLC’s (A) Objection to the Sale Motion and (B) Motion Requesting Orders (I) Setting a Status Conference, (II) Enforcing the Plan and Post-Confirmation Sale Procedures, and (III) Granting Related Relief* [Docket No. 562].

**PLEASE TAKE FURTHER NOTICE** that the deposition of Colin Chenault shall take place remotely via video conferencing on March 7, 2025, at 9:00 A.M. Eastern Standard Time and shall continue from day to day until completed. A video link will be provided prior to the deposition to give all interested parties who are permitted to observe or participate in such deposition adequate notice and opportunity to do so by phone and/or video.

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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.

**PLEASE TAKE FURTHER NOTICE** that the deposition will be taken pursuant to all applicable rules of the Court before a notary public or other such person authorized by law to administer oaths. The deposition will be recorded by stenographic means and may also be recorded by sound and visual means, including means for the instant display of testimony on computer.

Dated: February 28, 2025  
Wilmington, Delaware

/s/ Christopher M. Lambe  
Ryan M. Bartley (No. 4985)  
Michael S. Neiburg (No. 5275)  
Joseph M. Mulvihill (No. 6061)  
Christopher M. Lambe (No. 6846)  
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*Counsel to Kiron Capital, LLC*

# **EXHIBIT C**

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

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In re:

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

Debtors.

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)  
) Chapter 11 (Subchapter V)  
)  
) Case No. 24-10279 (JKS)  
)  
) (Jointly Administered)  
)  
)

**AMENDED NOTICE OF DEPOSITION OF DAVID HASSINGER**

**PLEASE TAKE NOTICE** that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, as made applicable by Rules 7026, 7030, and 9014 of the Federal Rules of Bankruptcy Procedure, Kiron Capital, LLC and its wholly owned subsidiaries Doc Management Services, LLC, and Confidas Orthopedic & Spine, PLLC (collectively, “Kiron”), will take the deposition upon oral examination of David Hassinger in connection with the *Kiron Capital, LLC’s (A) Objection to the Sale Motion and (B) Motion Requesting Orders (I) Setting a Status Conference, (II) Enforcing the Plan and Post-Confirmation Sale Procedures, and (III) Granting Related Relief* [Docket No. 562].

**PLEASE TAKE FURTHER NOTICE** that the deposition of David Hassinger shall take place remotely via video conferencing on March 5, 2025, at 3:30 P.M. Eastern Standard Time, or such date and time that may otherwise be agreed to by the Debtors, Provident, and Kiron, and shall continue from day to day until completed. A video link will be provided prior to the deposition to give all interested parties who are permitted to observe or participate in such deposition adequate notice and opportunity to do so by phone and/or video.

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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.

**PLEASE TAKE FURTHER NOTICE** that the deposition will be taken pursuant to all applicable rules of the Court before a notary public or other such person authorized by law to administer oaths. The deposition will be recorded by stenographic means and may also be recorded by sound and visual means, including means for the instant display of testimony on computer.

Dated: February 28, 2025  
Wilmington, Delaware

/s/ Christopher M. Lambe  
Ryan M. Bartley (No. 4985)  
Michael S. Neiburg (No. 5275)  
Joseph M. Mulvihill (No. 6061)  
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*Counsel to Kiron Capital, LLC*