

I. CONTESTED MATTERS

1. [SEALED] Omnibus Motion in Limine of Carepoint Health Captive Assurance Company, LLC to Exclude Certain Evidence and Testimony at the Confirmation Hearing [Filed: 03/04/2025; D.I. 827].

Related Documents:

- A. **Joinder [of Maple Healthcare, LLC] in Omnibus Motion *In Limine* of CarePoint Health Captive Assurance Company, LLC to Exclude Certain Evidence and Testimony at the Confirmation Hearing [Filed: 03/07/2025; D.I. [862](#)].**
- B. **[UNSEALED] Omnibus Motion *In Limine* of CarePoint Health Captive Assurance Company, LLC to Exclude Certain Evidence and Testimony at the Confirmation Hearing [Filed: 03/07/2025; D.I. [889](#)].**

Objection Deadline: March 7, 2025

Objections/Responses Received:

- C. **CarePoint Health Systems Inc. d/b/a Just Health Foundation, *et al.*'s Response in Opposition to CarePoint Health Captive Assurance Company, LLC's Omnibus Motion *In Limine* to Exclude Certain Evidence and Testimony at the Confirmation Hearing [Filed: 03/07/2025; D.I. [877](#)].**
- D. **Joinder [of Hudson Regional Hospitals, LLC] to Objection to Motion *In Limine* [Filed: 03/07/2025; D.I. [890](#)].**

Status: This matter is going forward.

2. Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 01/24/2025; D.I. [551](#)].

Related Documents:

- A. Order (I) Approving the Disclosure Statement on an Interim Basis; (II) Scheduling a Combined Hearing on Final Approval of the Disclosure Statement, Plan Confirmation and Deadlines Related Thereto; (III) Approving the Solicitation, Notice and Tabulation Procedures and Forms Related Thereto; and (IV) Granting Related Relief [Filed: 01/24/2025; D.I. [555](#)].

- B. Notice of Plan Supplement to the Combined Disclosure Statement and Joint Chapter 11 Plan Proposed by the Debtors and the Official Committee of Unsecured Creditors [Filed: 02/20/2025; D.I. [730](#)].
- C. Amended Exhibit F to Notice of Plan Supplement [Filed: 02/27/2025; D.I. [768](#)].
- D. Fifth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/06/2025; D.I. [856](#)].

Objection Deadline: February 28, 2025 at 4:00 p.m. (ET). An extension to March 3, 2025 has been granted for Maple Healthcare, Strategic Ventures, MedOne/Mazuma, Captive and the U.S. Trustee. An extension to March 4, 2025 has been granted for IDB Bank, Dr. Vijayant Singh, Gloria and Chereese Johnson, and the County of Hudson. An extension to March 5, 2025 has been granted for United Healthcare, Committee of Interns and Residents/SEIU, Aetna and Journal Square Urban Renewal Associates. An extension to March 6, 2025 has been granted for the NJ Dept. of Health and the City of Hoboken. Capitala has been granted an extension through the start of the confirmation hearing.

Objections/Responses Received:

- E. Reservation of Rights of 750 Park LLC, CH Castle LLC, J.C. Opco, LLC and SB Hoboken Propco, LLC with Respect to the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 02/27/2025; D.I. [769](#)].
- F. Objection and Reservation of Rights of Creditor, Resolute Perioperative Services, LLC to the Approval of the Debtors and the Official Committee of Unsecured Creditors' Chapter 11 Plan of Reorganization [Filed: 02/28/2025; D.I. [776](#)].
- G. Limited Objection and Reservation of Rights of Health Professionals and Allied Employees to the Confirmation of the Combined Plan and Disclosure Statement [Filed: 02/28/2025; D.I. [777](#)].
- H. Limited Objection and Reservation of Rights of District 1199J NUHHCE FSCME AFL-CIO to the Confirmation of the Combined Plan and Disclosure Statement [Filed: 02/28/2025; D.I. [778](#)].
- I. Limited Objection of Sodexo Operations, LLC to (I) Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (II) Proposed Cure Amount Set Forth in the notice of Filing of Plan Supplement to the Combined Disclosure Statement and Joint Chapter 11 Plan Proposed by the Debtors and the Official Committee of Unsecured Creditors [Filed: 02/28/2025; D.I. [779](#)].

- J. Objection of 750 Park LLC, CH Castle LLC, J.C. Opco, LLC and SB Hoboken Propco, LLC to the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 02/28/2025; D.I. [780](#)].
- K. Objection of Access Information Management Corporation to Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 02/28/2025; D.I. [782](#)].
- L. Limited Objection of Med One Capital Funding, LLC and Mazuma Capital Corp to (A) The Debtors' Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization, etc. [Filed: 02/28/2025; D.I. [784](#)].
- M. Limited Objection and Reservation of Rights of VRC Companies, LLC to Confirmation of the Debtors' Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and Objection to Potential Cure Claim, Assumption and Rejection of Executory Contract for the Storage of Medical and Other Records [Filed: 02/28/2025; D.I. [785](#)].
- N. Limited Objection of Horizon Health Care Services, Inc. and Affiliates to Schedule of Assumed Executory Contracts and Unexpired Leases Filed in Connection with Debtors' Combined Plan and Disclosure Statement [Filed: 02/28/2025; D.I. [787](#)].
- O. Response and Limited Objection of JNESO, District Council 1 IUOE AFL-CIO, to Plan Proponents' Fourth Amended Joint Plan of Reorganization [Filed: 02/28/2025; D.I. [788](#)].
- P. Objection of the United States Trustee to Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Plan of Reorganization [Filed: 03/03/2025; D.I. [795](#)].
- Q. Limited Objection of Saint Peter's University Hospital to Plan Proponents' Proposed Assumption of Exclusive Services Agreement for Neonatal Services [Filed: 03/03/2025; D.I. [804](#)].
- R. [SEALED] Objection of Strategic Ventures LLC to Final Approval and Confirmation of Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/03/2025; D.I. 806].
- S. Cure Objection [of UnitedHealthcare Insurance Company] to Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [818](#)].
- T. Objection [of Maple Healthcare, LLC] to Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. [819](#)].

- U. Committee of Interns and Residents, SEIU’s Reservation of Rights to Debtors’ Fourth Amended Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. [821](#)].
- V. [SEALED] Objection of CarePoint Health Captive Assurance Company, LLC to Final Approval and Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. 822].
- W. Objection of the Lawler Entities to the Plan Proponents’ Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/04/2025; D.I. [823](#)].
- X. Joinder and Objection to Final Approval of the Disclosure Statement and Confirmation of the Plan [Freehold Trust; Benego Ventures, LLC; Briar Hill Ventures, LLC; Pheasant Run Ventures, LLC; and Vivek Garipalli, collectively the “Objectors”] [Filed: 03/04/2025; D.I. [824](#)].
- Y. Objection of Dr. Vijayant Singh, in his Capacity as Relator, to Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/05/2025; D.I. [834](#)].
- Z. Objection [of Union Kennedy Associates L.P.] to Debtors’ Amended Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/05/2025; D.I. [835](#)].
- AA. Reservation of Rights of County of Hudson With Respect to the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/05/2025; D.I. [836](#)].
- BB. Amended Objection [of Union Kennedy Associates L.P.] to Debtors’ Amended Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/05/2025; D.I. [837](#)].
- CC. Journal Square Plaza Urban Renewal Associates Objection to Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/05/2025; D.I. [839](#)].
- DD. Journal Square Plaza Urban Renewal Associates’ Amended Objection to Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/05/2025; D.I. [845](#)].
- EE. Exhibits to Cure Objection [of UnitedHealthcare Insurance Company] to Schedule of Assumed Executory Contracts and Unexpired Leases [Filed: 03/04/2025; D.I. [851](#)].
- FF. Limited Objection and Reservation of Rights of the City of Hoboken to Schedule of Assumed Executory Contracts and Unexpired Leases Filed in

Connection with Debtors' Fourth Amended Combined Disclosure Statement and Joint Plan of Reorganization [Filed: 03/06/2025; D.I. [854](#)].

- GG. Objection of Strategic Ventures LLC to Final Approval and Confirmation of Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Filed: 03/06/2025; D.I. [857](#)].
- HH. **Limited Objection and Reservation of Rights of Aetna, Inc. and Affiliates to Schedule of Assumed Executory Contracts and Unexpired Leases in Connection with the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization** [Filed: 03/07/2025; D.I. [865](#)].
- II. **Declaration of Debbie White in Support of Limited Objection and Reservation of Rights of Health Professionals and Allied Employees, to the Confirmation of the Combined Plan and Disclosure Statement** [03/07/2025; D.I. [868](#)].
- JJ. **Declaration of Craig Ford in Support of Limited Objection and Reservation of Rights of District 1199J NUHHCE FSCME AFL-CIO to the Confirmation of the Combined Plan and Disclosure Statement** [Filed: 03/07/2025; D.I. [870](#)].

Additional Documents:

- KK. **Declaration of Debbie White, RN in Support of the Proposed Plan** [Filed: 03/07/2025; D.I. [876](#)].
- LL. **Plan Proponents' Memorandum of Law (I) in Support of Confirmation of Fifth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization; and (II) in Response to Confirmation Objections** [Filed: 03/07/2025; D.I. [883](#)].
- MM. **Declaration of Angela Murdock-Ridley** [Filed: 03/07/2025; D.I. [884](#)].
- NN. **Notice of Filing of Proposed Findings of Fact, Conclusions of Law, and Order Confirming Fifth Amended Joint Combined Disclosure Statement and Joint Plan of Reorganization** [Filed: 03/07/2025; D.I. [886](#)].
- OO. **[UNSEALED] Objection of CarePoint Health Captive Assurance Company, LLC to Final Approval and Confirmation of the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization** [Filed: 03/07/2025; D.I. [888](#)].
- PP. **Reservation of Rights of Pennsylvania Manufacturers' Association Insurance Company to Confirmation of the Combined Plan and Disclosure Statement** [Filed: 03/10/2025; D.I. [901](#)].

- QQ. **Objection of Pennsylvania Manufacturer's Association Insurance Company to Debtors' Amended Schedule of Assumed Executory Contracts and Unexpired Leases** [Filed: 03/10/2025; D.I. [905](#)].
- RR. **[SEALED] Declaration of Thomas J. Seibert (I) In Support of the Limited Objection and Reservation of Rights of VRC Companies, LLC to Confirmation of the Debtors Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and Objection to Cure Claims, to Assumption and to Potential Rejection of Executory Contract and (II) In response to Plan Proponents Memorandum of Law** [Filed: 03/10/2025; D.I. 909].
- SS. **Roman Catholic Archdiocese of Newark's Limited Objection and Reservation of Rights to the Debtors' Schedule of Assumed Executory Contracts in Connection with the Fourth Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization** [Filed: 03/10/2025; D.I. [910](#)].
- TT. **Objection of UKG Kronos Systems LLC to Debtors' Amended Schedule of Assumed Executory Contracts and Unexpired Leases** [Filed: 03/10/2025; D.I. [912](#)].

Status: This matter is going forward. Objections relating to cure amounts for leases and contracts will not be determined at the confirmation hearing.

II. ADDITIONAL MATTERS

3. **Motion of CarePoint Health Captive Assurance Company, LLC to For a Protective Order Quashing Any Obligation to Testify at a Deposition Pursuant to Fed. R. Civ. P. 30(B)(6)** [Filed: 03/04/2025; D.I. [815](#)]

Related Documents: None.

Objection Deadline: N/A

Objections/Responses Received:

- A. **CarePoint Health Systems Inc. d/b/a Just Health Foundation, *et al.*'s Opposition to CarePoint Health Captive Assurance Company, LLC's Omnibus Motion for a Protective Order Quashing Any Obligation to Testify at a Deposition Pursuant to Fed. R. Civ. P. 30(B)(6)** [Filed: 03/10/2025; D.I. [907](#)].

Status: This matter is going forward.

Witness List:

Witness Name	Party for
Emily Young, Director for Epiq Corporate Restructuring, LLC	Debtor
The Honorable Kevin Gross, Member of Reorganization Committee	Debtor
Shamiq Syed, Chief Financial Officer for the Debtors	Debtor
Angela Murdock-Ridley, Vice President of Finance for Hudson Regional Hospital, LLC	Debtor
Louis Robichaux, IV	Debtor
Debbie White, Member and Chair of the Committee	Official Committee of Unsecured Creditors
Representative of CarePoint Health Captive Assurance Company, LLC	CarePoint Health Captive Assurance Company, LLC
Douglas Placa	JNESO
Aisha Harrison	JNESO
Mickey Kaiser, representative of Corporate Advisory Solutions, LLC	Strategic Ventures
Thomas J. Reck, CPA/ABV/CFF, Partner with Withum Smith+Brown, PC.	HRH

Dated: March 10, 2025

DILWORTH PAXSON LLP/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)
1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 754-4603

Email: lmc michael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Counsel for the Debtors