

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

**Ref. Docket No. 2321**

**CERTIFICATE OF SERVICE**

I, GEOFF ZAHM, hereby certify that:

1. I am employed as a Senior Case Manager by Epiq Corporate Restructuring, LLC, with its principal office located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. On April 21, 2025, I caused to be served the *customized* "Notice of Filing Plan Supplement for the Debtors' Joint Chapter 11 Plan of Reorganization," dated April 18, 2025, *related to Docket No. 2321*, a sample of which is annexed hereto as Exhibit A, by causing true and correct copies to be enclosed securely in separate postage pre-paid envelopes and delivered via first class mail to those parties listed on the annexed Exhibit B.
3. All envelopes utilized in the service of the foregoing contained the following legend: "LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF ADDRESSEE, PRESIDENT, OR LEGAL DEPARTMENT."

/s/ Geoff Zahm

Geoff Zahm

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<sup>1</sup> A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors' service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

## **EXHIBIT A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

WELLPATH HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

**NOTICE OF FILING PLAN SUPPLEMENT FOR THE  
DEBTORS' JOINT CHAPTER 11 PLAN OF REORGANIZATION**

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**PLEASE TAKE NOTICE THAT**, on March 18, 2025, the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”) entered an order (the “Solicitation Order”) (a) conditionally approving the *Disclosure Statement for the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates* (the “Disclosure Statement”) as containing “adequate information” pursuant to section 1125 of the Bankruptcy Code, (b) approving the Solicitation and Voting Procedures<sup>2</sup> on a final basis and authorizing the above-captioned debtors and debtors in possession (collectively, the “Debtors”) to solicit votes to accept or reject the *Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates* (as modified, amended, or supplemented from time to time, the “Plan”) in accordance with such procedures, (c) approving the forms of Ballots, Solicitation Package, and other related notices on a final basis, and (d) approving the Confirmation Schedule on a final basis.

**PLEASE TAKE FURTHER NOTICE** that attached hereto are the drafts of documents or forms of documents set forth below, which form part of the Plan Supplement:

<b>Exhibit A</b>	New Organizational Documents
<b>Exhibit B</b>	Members of New Board
<b>Exhibit C</b>	Equity Financing Documents
<b>Exhibit D</b>	Takeback Facility Documents
<b>Exhibit E</b>	Rejected Executory Contracts and Unexpired Leases Schedule
<b>Exhibit F</b>	Schedule of Retained Causes of Action

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<sup>1</sup> A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors’ Claims and Solicitation Agent at <https://dm.epiq11.com/Wellpath>. The Debtors’ service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Solicitation Order or the Plan (as defined below), as applicable.

<b>Exhibit G</b>	Schedule of Liquidating Trust Causes of Action
<b>Exhibit H</b>	Restructuring Transactions Memorandum
<b>Exhibit I</b>	Liquidating Trust Documents
<b>Exhibit J</b>	Liquidating Trustee and Members of Liquidating Trust Advisory Board

**PLEASE TAKE FURTHER NOTICE** that the Debtors reserve all rights, in consultation with or with the consent of the Ad Hoc Group and the Committee, to the extent required under the Plan (as may be amended, supplemented, or modified), to alter, amend, modify, or supplement the Plan Supplement and any of the documents contained herein in accordance with the terms of the Plan at any time before the Effective Date of the Plan or any such other date as may be provided for by the Plan or by order of the Bankruptcy Court, upon notice to the Ad Hoc Group and the Committee; *provided, however*, that, if any document in the Plan Supplement is altered, amended, modified, or supplemented in any material respect prior to the date of the Confirmation Hearing, the Debtors will file a redline of such document with the Bankruptcy Court and provide notice thereof to the parties on the master service list pursuant to Bankruptcy Rule 2002. The final version of any such document may contain material differences from the version filed herewith. For the avoidance of doubt, the documents, or portions thereof, contained in the Plan Supplement remain subject to continuing negotiations among the Debtors, the Ad Hoc Group, and the Committee, and the Ad Hoc Group and the Committee have not consented to such documents as being in final form and reserve all rights in that regard.

**PLEASE TAKE FURTHER NOTICE** that the forms of the documents contained in the Plan Supplement are integral to—and, for the avoidance of doubt, are considered part of and incorporated by reference into—the Plan. For the avoidance of doubt, if the Plan is confirmed, the Plan Supplement documents will be approved by the Bankruptcy Court pursuant to the Confirmation Order.

**PLEASE TAKE FURTHER NOTICE THAT** the hearing at which the Bankruptcy Court will consider Confirmation of the Plan (the “Confirmation Hearing”) will commence on **April 30, 2025 at 8:30 a.m. (prevailing Central Time)** before the Honorable Alfredo R Pérez, in the United States Bankruptcy Court for the Southern District of Texas, located at 515 Rusk Street, Courtroom 400, Houston, Texas 77002.

**PLEASE TAKE FURTHER NOTICE THAT** the deadline for filing objections to the Plan is **April 22, 2025 at 4:00 p.m. (prevailing Central Time)** (the “Plan Objection Deadline”). All objections to the relief sought at the Confirmation Hearing *must* (a) be in writing, (b) conform to the Bankruptcy Code, Bankruptcy Rules, the Bankruptcy Local Rules, and any orders of the Bankruptcy Court, (c) state, with particularity, the basis and nature of any objection to the Plan and, if practicable, a proposed modification to the Plan that would resolve such objection, (d) be filed with the Bankruptcy Court on or before the Plan Objection Deadline, and (e) be served on (i) proposed counsel to the Debtors, McDermott Will & Emery, LLP, 444 West Lake Street, Suite 4000 Chicago, Illinois 60606-0029, Attn: Felicia Gerber Perlman, Bradley Thomas Giordano, Jake Jumbeck, Carole Wurzelbacher, and Carmen Dingman,

and One Vanderbilt Avenue, New York, New York 10017, Attn: Steven Z. Szanzer, (ii) counsel to the DIP Lenders and the Ad Hoc Group, Akin Gump Strauss Hauer & Feld, LLP, 2001 K Street N.W., Washington, DC 20006, Attn.: Scott L. Alberino and Kate Doorley, (iii) counsel to the Prepetition First Lien Administrative Agent and Prepetition Second Lien Administrative Agent, Cahill Gordon & Reindel LLP, 32 Old Slip, New York, NY 10005, Attn: Joel H. Levitin (jlevitin@cahill.com) and Jordan A. Wishnew (jwishnew@cahill.com) and Norton Rose Fulbright US LLP, 1550 Lamar Street, Suite 2000, Houston, TX 77010, Attn: Bob Bruner (bob.bruner@nortonrosefulbright.com), (iv) counsel to the Committee, Proskauer Rose LLP, Eleven Times Square, New York, NY 10036, Attn: Ehud Barak and Daniel Desatnik, and Stinson LLP, 1201 Walnut, Suite 2900, Kansas City, MO 64106, Attn: Nicholas Zluticky and Zachary Hemenway, and (v) the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, Texas 77002, Attn: Susan Hersh and Ha Nguyen.

**PLEASE TAKE FURTHER NOTICE THAT** if you would like to obtain a copy of the Disclosure Statement, the Plan, the Plan Supplement, or related documents, you should contact Epiq Corporate Restructuring, LLC, the Claims and Solicitation Agent retained by the Debtors in these chapter 11 cases (the “Claims and Solicitation Agent”), by (a) writing to Wellpath Holdings, Inc., c/o Epiq Ballot Processing, 10300 SW Allen Boulevard, Beaverton, OR 97005, (b) emailing WellpathInfo@epiqglobal.com, or (c) calling the Debtors’ restructuring hotline at (888) 884-6182 (US toll free) or (503) 479-4073 (international). You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <http://www.txs.uscourts.gov>. Copies of certain orders, notices, and pleadings, as well as other information regarding these chapter 11 cases, are also available for inspection free of charge online at <https://dm.epiq11.com/Wellpath>.

ARTICLE IX OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS, AND **ARTICLE IX.D CONTAINS A THIRD-PARTY RELEASE**. THUS, YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

**THIS NOTICE IS BEING SENT TO YOU FOR INFORMATIONAL PURPOSES ONLY. IF YOU HAVE QUESTIONS REGARDING THE SOLICITATION MATERIALS, THE SOLICITATION OR VOTING PROCESS, OR ABOUT ANYTHING STATED HEREIN, OR IF YOU WOULD LIKE TO OBTAIN ADDITIONAL INFORMATION, CONTACT THE CLAIMS AND SOLICITATION AGENT.**

Dated: April 18, 2025  
Dallas, Texas

*/s/ Marcus A. Helt*

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Marcus A. Helt (Texas Bar #24052187)  
MCDERMOTT WILL & EMERY LLP  
2501 N. Harwood Street, Suite 1900  
Dallas, Texas 75201-1664  
Telephone: (214) 295-8000  
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-and-

Felicia Gerber Perlman (admitted *pro hac vice*)  
Bradley Thomas Giordano (admitted *pro hac vice*)  
Jake Jumbeck (admitted *pro hac vice*)  
Carole Wurzelbacher (admitted *pro hac vice*)  
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Chicago, Illinois 60606-0029  
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bgordano@mwe.com  
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cwurzelbacher@mwe.com  
cdingman@mwe.com

-and-

Steven Z. Szanzer (admitted *pro hac vice*)  
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New York, New York 10017  
Telephone: (212) 547-5400  
Facsimile: (212) 547-5444  
Email: sszanzer@mwe.com

*Counsel to the Debtors and Debtors in Possession*

**Exhibit E**

**Rejected Executory Contracts and Unexpired Leases Schedule**

**THIS DRAFT REMAINS SUBJECT TO CONTINUING NEGOTIATIONS WITH THE AD HOC GROUP AND THE COMMITTEE AND THE FINAL VERSION MAY CONTAIN MATERIAL DIFFERENCES. FOR THE AVOIDANCE OF DOUBT, NO PARTY HAS CONSENTED TO THIS VERSION AS THE FINAL FORM, AND ALL PARTIES RESERVE THEIR RESPECTIVE RIGHTS WITH RESPECT TO THIS DOCUMENT AND ANY RELATED DOCUMENTS.**

**Exhibit A**

Counterparty	Debtor	Lease/Contract Description	Counterparty Address	Rejection Date
Addison Group	Wellpath LLC	Staffing Agencies	125 S WACKER DR, 27TH FL, CHICAGO, IL 60606	Plan Effective Date¹

¹Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates [Docket no. 1770-1] (as may be amended, supplemented, or otherwise modified from time to time, the "Plan").



## **EXHIBIT B**

Debtor: WELLPATH HOLDINGS, INC., et al.

Case #: 24-90533 (ARP)

Notices mailed by: April 21, 2025

NOTICE OF FILING PLAN SUPPLEMENT FOR THE DEBTORS' JOINT CHAPTER 11 PLAN OF  
REORGANIZATION

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ADDISON GROUP  
125 S WACKER DR, 27TH FL  
CHICAGO, IL 60606

ADMINS OF THE TULANE EDUCATIONAL FUND  
1430 TULANE AVE, TW-22  
NEW ORLEANS, LA 70112

ALERE TOXICOLOGY  
1111 NEWTON ST  
GRETN, LA 70053

ASSOCIATED RETINAL CONSULTANTS PC  
39650 ORCHARD HILL PLACE  
SUITE 200  
NOVI, MI 48375

BARTON ASSOCIATES INC  
PO BOX 417844  
BOSTON, MA 02241

BOSTON MEDICAL CENTER  
720 HARRISON AVENUE, 10TH FLOOR  
BOSTON, MA 02118

BOSTON UNIVERSITY EYE ASSOCIATES, INC.  
1 BOSTON MEDICAL CENTER PL  
BOSTON, MA 02118

BOSTON UNIVERSITY MEDICAL CENTER  
RADIOLOGISTS, INC.  
840 HARRISON AVE  
BOSTON, MA 02118-2905

CANDLER HOSPITAL INC  
101 ST. JOSEPH'S/CANDLER DRIVE  
POOLER, GA 31322

CENTER FOR BEHAVIORAL HEALTH LAS  
VEGAS, LLC  
2290 MCDANIEL STREET  
SUITE 1C  
LAS VEGAS, NV 89030

CENTURA ST ANTHONY HOSPITAL  
11600 W 2ND PL  
LAKEWOOD, CO 80228

COASTAL EMPIRE ORTHOPEDICS, LLC  
6715 FOREST PARK DRIVE  
SAVANNAH, GA 31406

COMPASS HEALTH  
2175 COOLIDGE RD  
EAST LANSING, MI 48823

COMPUTACENTER UNITED STATES INC  
6025 THE CORNERS PKWY  
STE 100  
NORCROSS, GA 30092

DIALYSIS CLINIC INC. - DAVIDSON COUNTY  
1633 CHURCH STREET SUITE 500  
NASHVILLE, TN 37203

DIALYSIS CLINIC, INC.  
905 LOUISIANA BOULEVARD NORTHEAST  
ALBUQUERQUE, NM 87110

DWARAKNADH R. BANALA M.D.  
DBA FLORIDA INTERNAL MEDICINE PL  
620 S LAKE ST STE 6  
LEESBURG, FL 34748

EMERSON HOSPITAL  
133 OLD ROAD TO 9 ACRE COR  
CONCORD, MA 01742

Debtor: WELLPATH HOLDINGS, INC., et al.

Case #: 24-90533 (ARP)

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EPMG OF MICHIGAN PC  
5301 E. HURON RIVER DRIVE  
ANN ARBOR, MI 48106

FAVORITE HEALTHCARE STAFFING INC  
7255 W 98TH TER, BLDG 5  
STE 150  
OVERLAND PARK, KS 66212

FEDEX OFFICE AND PRINT SERVICES INC  
7900 LEGACY DR  
PLANO, TX 75024

FORREST CITY ARKANSAS HOSPITAL COMPANY  
LLC  
DBA FORREST CITY MEDICAL CENTER  
1601 NEWCASTLE ROAD  
FORREST CITY, AR 72335

GEORGIA EYE SURGICENTER, LLC  
DBA GEORGIA EYE INSTITUTE SURGERY  
CENTER  
4720 WATERS AVENUE  
SAVANNAH, GA 31404

GOOD SAMARITAN MEDICAL CENTER  
200 EXEMPLA CIRCLE  
LAFAYETTE, CO 80026

GRAND PRAIRIE HEALTHCARE PC  
1283 MURFREESBORO RD, STE 500  
NASHVILLE, TN 37217

HENRY FORD HEALTH JACKSON HOSPITAL  
2799 WEST GRAND BLVD  
DETROIT, MI 48202

HRK MEDICAL STAFFING INC  
1705 19TH PLACE STE C-1  
VERO BEACH, FL 32960

HURON VALLEY AMBULANCE  
1200 STATE CIRCLE  
ANN ARBOR, MI 48108

JACKSON & COKER LOCUMTENENS LLC  
2655 NORTHWINDS PARKWAY  
ALPHARETTA, GA 30009

KELLOGG EYE CENTER UNIVERSITY OF  
MICHIGAN HEALTH  
777 EAST EISENHOWER PARKWAY  
ANN ARBOR, MI 48108

LANGUAGE LINE SERVICES INC  
ONE LOWER RAGSDALE DR  
BLDG 2  
MONTEREY, CA 94930

LBMC STAFFING SOLUTIONS LLC  
3451 S MERCY RD  
GILBERT, AZ 85297

LEXISNEXIS  
9443 SPRINGBORO PIKE  
MIAMISBURG, OH 45342

LOCUMTENENS.COM LLC  
2655 NORTHWINDS PARKWAY  
ALPHARETTA, GA 30009

MEDIX STAFFING SOLUTIONS INC  
222 S RIVERSIDE PLZ, STE 2120  
CHICAGO, IL 60606

MOSAIC CONSULTING GROUP  
2503 EUGENIA  
NASHVILLE, TN 37211

Debtor: WELLPATH HOLDINGS, INC., et al.

Case #: 24-90533 (ARP)

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MSI SYSTEMS CORP  
23 VREELAND RD, STE 210  
FLORHAM PARK, NJ 07932

MYMICHIGAN MEDICAL CENTER SAULT  
500 OSBORN BLVD  
SAULT SAINTE MARIE, MI 49783

NASHOBA VALLEY MEDICAL CENTER  
200 GROTON RD  
AYER, MA 01432-1168

NASHVILLE GASTROENTEROLOGY AND  
HEPATOLOGY, PLLC  
330 WALLACE ROAD SUITE 103  
NASHVILLE, TN 37211

NORTH SUBURBAN MEDICAL CENTER  
9191 GRANT ST  
THORNTON, CO 80229

ON CALL STAFFING LLC  
4236 COLUMBIA RD  
MARTINEZ, GA 30907

ORTHOARKANSAS  
800 FAIR PARK BLVD  
LITTLE ROCK, AR 72204

RESERVE HEALTH PC  
2826 LAKE SHORE RD S  
DENVER, NC 28037

ROCKY MOUNTAIN CANCER CENTERS  
1700 S. POTOMAC ST.  
AURORA, CO 80012

SAINT JOSEPHS HOSPITAL  
1375 E 19TH AVE  
DENVER, CO 80218-1114

SHERIDAN HEALTHCORP INC.  
1613 N HARRISON PKWY  
STE 200  
SUNRISE, FL 33323-2853

SNAPMEDTECH INC  
999 PEACHTREE ST NE  
STE 2750  
ATLANTA, GA 30309

SPARROW HEALTH SYSTEM  
1215 E. MICHIGAN AVENUE  
LANSING, MI 48912

SURVIVAL FLIGHT INC  
705 HEBER SPRINGS RD  
BATESVILLE, AR 72501

SURVIVAL FLIGHT INC  
PO BOX 271375  
OKLAHOMA CITY, OK 73137

TALNTLY  
1100 KERMIT DR, STE 201  
NASHVILLE, TN 37217

TATTNALL HOSPITAL COMPANY, LLC  
610 SPARTA ROAD  
SANDERSVILLE, GA 31082

THE ADVOCACY GROUP AT CARDENAS  
PARTNERS LLC  
LLC 204 SOUTH MONROE STREET  
TALLAHASSEE, FL 32301

Debtor: WELLPATH HOLDINGS, INC., et al.

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THOMSON REUTERS  
610 OPPERMAN DRIVE  
EAGAN, MN 55123

TMOBILE USA INC  
12920 SE 38TH STREET  
BELLEVUE, WA 98006

TRIPATHI H. KUSH, MD  
4515 WILES RD, STE 201  
COCONUT CREEK, FL 33073

TULANE UNIVERSITY MEDICAL GROUP  
1440 CANAL ST STE 1501  
NEW ORLEANS, LA 70112

UNLV MEDICINE  
3016 W. CHARLESTON BLVD  
SUITE 100  
LAS VEGAS, NV 89102

UROLOGY SURGERY CENTER OF COLORADO,  
LLC  
2777 MILE HIGH STADIUM CIRCLE  
DENVER, CO 80211

VENTRE MEDICAL ASSOCIATES, LLC  
1400 EAST OAKLAND PARK BOULEVARD  
SUITE 210  
OAKLAND PARK, FL 33334

VISTA STAFFING SOLUTIONS LLC  
2800 EAST COTTONWOOD PKWY  
STE 400  
COTTONWOOD HEIGHTS, UT 84121

WEST GEORGIA EYE CARE CENTER  
2616 WARM SPRINGS ROAD  
COLUMBUS, GA 31904

Total Parties: 63