

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

In re:

WELLPATH HOLDINGS, INC., *et al.*,

Debtors.¹

)
) Chapter 11
)
) Case No. 24-90533 (ARP)
)
) (Jointly Administered)
)

**THE STATUTORY UNSECURED CREDITORS' COMMITTEE'S
LIMITED RESERVATION OF RIGHTS REGARDING THE
JOINT CHAPTER 11 PLAN OF REORGANIZATION OF WELLPATH
HOLDINGS, INC. AND CERTAIN OF ITS DEBTOR AFFILIATES**

The Statutory Unsecured Claimholders' Committee (the "Committee") of Wellpath Holdings, Inc, et al. (the "Debtors"), by and through its undersigned counsel, hereby submits this reservation of rights (the "Reservation") regarding the *Joint Chapter 11 Plan of Reorganization of Wellpath Holdings, Inc. and Certain of its Debtor Affiliates* [Docket No. 1832] (the "Plan").² In support hereof, the Committee respectfully states as follows:

LIMITED RESERVATION OF RIGHTS

1. As announced at the April 15, 2025 hearing, the Committee, the Debtors, and certain other parties in interest have reached an agreement in principal to settle the Committee's outstanding objections to the Plan. *See* April 15, 2025 Hr'g Tr. at 2. The Committee remains in support of the proposed settlement and believes that it is in the best interests of all general unsecured claimholders and the Debtors. The Committee clarified, however, it "may ask for your Honor's indulgence and some short hearings" if the parties to the settlement cannot otherwise agree to the necessary revisions to the Plan and related documents. *Id.* at 7:2-3. While the

¹ 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.

² Capitalized but undefined terms shall have the meaning ascribed to them in the Plan.

Committee is pleased with the progress made by the parties to-date in incorporating the settlement into the Plan and related documents, there are remaining issues that have yet to be finalized. Although the Committee is optimistic these issues will be resolved prior to the confirmation hearing, it reserves its rights with respect to such unresolved issues. The Committee continues to support the Plan in all other respects.

[Remainder of page intentionally left blank]

Respectfully submitted this 28th day of April, 2025.

STINSON LLP

By: /s/ Nicholas Zluticky

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*Counsel to the Statutory
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Certificate of Service

I certify that on April 28th, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Nicholas Zluticky

Nicholas Zluticky