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*Proposed Counsel for the Debtors and Debtors-in-Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re:	)	
	)	Chapter 11
	)	
INSPIRED HEALTHCARE CAPITAL	)	Case No. 26-90004 (MXM)
HOLDINGS, LLC, <i>et al.</i> <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	

**DEBTORS’ MOTION FOR ENTRY OF AN ORDER  
PURSUANT TO BANKRUPTCY RULE 2004 (I) DIRECTING EXAMINATION OF  
EMERSON EQUITY, LLC AND CERTAIN AFFILIATES AND (II) DIRECTING THE  
PRODUCTION OF DOCUMENTS**

Inspired Healthcare Capital Holdings, LLC (“Holdings”) and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned Chapter 11 cases (collectively, the “Debtors”) hereby submit this motion (the “Motion”) pursuant to Rules 2004 and 9016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Section 105(a) of

<sup>1</sup> The last four digits of Inspired Healthcare Capital Holdings, LLC’s federal tax identification number are 6696. There are 161 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/InspiredHealthcare>. The Debtors’ mailing address is 7033 East Greenway Parkway, Suite 250, Scottsdale, AZ 85254.

Title 11 of the Bankruptcy Code (the “Bankruptcy Code”), and Local Rule 2004-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Texas (the “Local Rules”), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), authorizing the Debtors to issue discovery without the need for further relief from this Court in the form of the production of documents responsive to the document requests set forth on **Exhibit B** attached hereto (the “Requests”) from Emerson Equity LLC and certain affiliates (collectively, “Emerson”). In support of this Motion, the Debtors respectfully represent as follows:

### **JURISDICTION AND VENUE**

1. The Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas. This matter is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are Section 105(a) of the Bankruptcy Code, and Rules 2004 and 9016 of the Bankruptcy Rules.

### **BACKGROUND**

#### **1. The Chapter 11 Case**

1. On February 2, 2026 (the “Petition Date”), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Northern District of Texas, Fort Worth Division (the “Court”). The Debtors continue to operate their businesses and manage their properties as debtors and debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

2. To date, the Office of the United States Trustee for Region 6 (the “U.S. Trustee”) has not appointed an official committee in these Chapter 11 Cases, nor has any trustee or examiner been appointed.

3. Additional information regarding the Debtors and these Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of these Chapter 11 Cases, is set forth in the First Day Declaration.

4. Prior to the Petition Date, Emerson was the Debtors’ broker-dealer and assisted the Debtors in equity fundraising activities through the marketing and sale of certain securities. Prior to the Petition Date, Emerson was substantively involved with the Debtors, the operation of the Debtors’ business, the Debtors’ activities with respect to equity funding, as well as being privy to other important facets of the Debtors and their businesses through Emerson’s position as the Debtors’ broker-dealer.

5. Pursuant to the Debtors’ duties under the Bankruptcy Code to preserve property of the estate and maximize value for all creditors and stakeholders, the Debtors seek to obtain certain documents, communications, and other materials from Emerson concerning its relationship with the Debtors, their businesses, and other matters set forth herein as stated in the Requests.

### **BASIS FOR RELIEF REQUESTED**

#### **I. Discovery Under Rule 2004**

6. Under Fifth Circuit law, a trustee or debtor-in-possession has a duty to investigate the financial affairs of the debtor and prepetition conduct. *See In re Red River Energy, Inc.*, 409 B.R. 163, 181 (Bankr S.D. Tex. 2009). Bankruptcy Rule 2004 provides the Court with authority to order an examination of any entity or person if such examination relates “to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may

affect the administration of the debtors' estate ... [and to] any other matter relevant to the case or to the formulation of a plan." Fed. R. Bankr. P. 2004(b).

7. "The purpose of a Rule 2004 examination is to assist a party in interest in determining the nature and extent of the bankruptcy estate, revealing assets, examining transactions and assessing whether wrongdoing has occurred." *In re Recoton Corp.*, 307 B.R. 751, 755 (Bankr. S.D.N.Y. 2004); *In re Ionosphere Clubs, Inc.*, 156 B.R. 414, 432 (S.D.N.Y. 1993). The scope of a Rule 2004 examination is broad. *See, e.g., In re Kipp*, 86 B.R. 490, 491 (Bankr. W.D. Tex. 1988); *In re Enron Corp. Sec. Litig.*, No. H-01-3624, 2004 WL 613091, at \*3 (S.D. Tex. Mar. 16, 2004); *In re Edic*, No. 05-41557, 2005 WL 6443541, at \*1 (Bankr. N.D. Tex. Oct. 7, 2005) ("Rule 2004 is very broad in scope"). Indeed, any third party that has a relationship with a debtor may be subject to examination. *See e.g., Ionosphere Clubs*, 156 B.R. at 432; *Recoton Corp.*, 307 B.R. at 755; *In re Cousins Barricades & Metal Prods.*, No. Civ.A. 99-2035, 2000 WL 245860 at \*3 (E.D. La. March 2, 2000).

8. Rule 2004 provides that, upon the motion of any party in interest, the Court may authorize the examination of any entity, through both document requests and depositions, relating "to the acts, conduct, or property or to the liabilities and financial condition of the debtor, or to any matter which may affect the administration of the debtor's estate." Fed. R. Bankr. P. 2004(b).

9. Specifically, Rule 2004 enables a party in interest to

obtain information about the debtor's financial condition, matters that may affect the administration of the debtor's estate, right to a discharge, or operation of a business and the desirability of its continuance, sources of, and consideration for, money or property or consummate a plan, and other matters relevant to the case or formulation of a plan.

*In re Daisytek, Inc.*, 323 B.R. 180, 187 (N.D. Tex. 2005).

10. Rule 2004 is an investigatory tool and is extremely broad in scope. *See In re Correr*, 589 B.R. 76, 113 (Bankr. N.D. Tx. 2018); *In re Drexel Burnham Lambert Group, Inc.*, 123 B.R. 702, 711 (Bankr. S.D.N.Y. 1991) (same); *see also In re ECAM Publications, Inc.*, 131 B.R. 556, 559 (Bankr. S.D.N.Y. 1991).

11. In fact, courts repeatedly have compared Rule 2004 examinations to a “licensed fishing expedition.” *In re NE 40 Partners, Ltd. Partnership*, 440 B.R. 124, 129 (Bankr S.D. Tex. 2010); *In re French*, 145 B.R. 991, 992 (Bankr. D.S.D. 1992) (“Bankruptcy Rule 2004 is designed to be a quick ‘fishing expedition’ into general matters and issues regarding the administration of the bankruptcy case . . .”); *In re GHR Energy Corp.*, 33 B.R. 451, 453 (Bankr. D. Mass.1983) (“The scope of a Rule 2004 examination is broad. Indeed, some have compared it to a ‘fishing expedition.’”); *In re Duratech Industries, Inc.*, 241 B.R. 283, 289 (E.D.N.Y. 1999); *In re Bennett Funding Grp., Inc.*, 203 B.R. 24, 28 (Bankr. N.D.N.Y. 1996); *see also In re Kipp*, 86 B.R. 490, 491 (Bankr. W.D. Tex. 1988) (“Bankruptcy Rule 2004 authorizes examination of any entity and the scope of such examination is virtually unlimited.”).

12. To establish good cause for a Rule 2004 examination, the Debtors need only demonstrate that an examination is reasonably necessary to protect the estates’ legitimate interests and if examination is necessary to establish a claim of the Debtors. *See In re McClain Feed Yard, Inc.*, 661 B.R. 136, 142 (Bankr. N.D. Tex. 2024).

## **II. Good Cause Exists for a Rule 2004 Examination**

13. Good cause exists for a Rule 2004 examination and the production of documents because the documents and information requested in the Motion are essential to the Debtors’ efforts to maximize the value of the Debtors’ estates and investigate potential claims and causes of actions that may exist which may inure to the benefit of the Debtors’ creditors and stakeholders.

14. The Debtors believe that important records, documents, communications and other materials which relate to the Debtors' business and dealings with third parties prepetition are in the possession, custody, or control of Emerson. Specifically, Emerson played a significant role in the Debtors' prepetition business activities, including the Debtors' financial affairs and equity fundraising activities. Based on such prepetition involvement, Emerson, and those acting on its behalf, frequently corresponded with and engaged with the Debtors' management. The Debtors believe that the information sought in the Requests is pertinent to the Debtors' investigation of potential claims and causes of action belonging to the estate.

15. Accordingly, by this Motion, the Debtors seek an order authorizing the Debtors to conduct a Rule 2004 examination of Emerson and directing Emerson to produce the documents listed in the Requests that will enable the Debtors to maximize the value of their estates and fully investigate potential claims and causes of action belonging thereto.

**COMPLIANCE WITH L.R. 2004-1(A)**

16. In accordance with Local Rule 2004-1(A), the Debtors are not aware of any counsel representing Emerson to conference with in an attempt to coordinate compliance with the 2004 Request. Given Emerson's relationship with Holdings, the Debtors have an urgent need for the information it has in its possession that necessitates resolution of this Motion. Further, the Debtors understand that Emerson would not agree to provide the requested information and that the Motion would have to be presented to the Court for determination.

**NOTICE**

17. The Debtors will provide notice of the Motion to: (a) Emerson and counsel thereto; (b) the U.S. Trustee; (c) the United States Attorney for the Northern District of Texas; (d) the Attorney General for the State of Texas; (e) the Centers for Medicare and Medicaid Services;

(f) the Attorneys General for the states in which the Debtors conduct business; (g) the parties included on the Debtors' list of their 30 largest unsecured creditors; (h) counsel to the Debtors' prepetition lenders; (i) counsel to the DIP Lenders; and (j) all parties entitled to notice pursuant to Bankruptcy Rule 2002. The Debtors submit that no other or further notice is required.

### **RESERVATION OF RIGHTS**

18. This Motion is submitted without prejudice to, and with a full reservation of, the Debtors' rights to request and conduct any other or further discovery, pursuant to Rule 2004 or other applicable law, from any person or entity, including seeking additional and further discovery from Emerson.

### **CONCLUSION**

WHEREFORE, for the reasons stated herein, the Debtors respectfully request entry of the Proposed Order directing the examination of Emerson pursuant to Bankruptcy Rule 2004 and directing the production of documents as set forth in the Rule 2004 Request and granting such other and further relief as the Court deems just and proper.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A** granting the relief requested herein and such other and further relief as may be just and proper.

Dated: March 13, 2026  
Dallas, Texas

**MCDERMOTT WILL & SCHULTE LLP**

*/s/ Marcus A. Helt*

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*Proposed Counsel to the Debtors and  
Debtors-in-Possession*

**CERTIFICATE OF SERVICE**

I hereby certify that on this date a true and correct copy of the foregoing Motion was served by the Court's CM/ECF system on all counsel of record registered in these Chapter 11 Cases through CM/ECF. Subject to the Court's approval of their retention and access to filing privileges, the Debtors' proposed claims and noticing agent will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing Motion.

Dated: March 13, 2026  
Dallas, Texas

**MCDERMOTT WILL & SCHULTE LLP**

*/s/ Marcus A. Helt*

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Marcus A. Helt

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

	)	
In re:	)	Chapter 11
	)	
INSPIRED HEALTHCARE CAPITAL	)	Case No. 26-90004 (MXM)
HOLDINGS, LLC, <i>et al.</i> <sup>1</sup>	)	
	)	(Jointly Administered)
	)	
Debtors.	)	Related to Docket No. ___

**ORDER GRANTING DEBTORS' MOTION  
FOR ENTRY OF AN ORDER PURSUANT TO BANKRUPTCY  
RULE 2004 (I) DIRECTING EXAMINATION OF EMERSON EQUITY, LLC,  
AND CERTAIN AFFILIATES  
AND (II) DIRECTING THE PRODUCTION OF DOCUMENTS**

Upon the Motion of the Debtors pursuant to Rules 2004 and 9016 of the Bankruptcy Rules for an Order Authorizing the examination of, and the production of documents (the "Motion")<sup>2</sup>, and upon consideration of the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Order of Reference of Bankruptcy Cases and Proceedings Nunc Pro Tunc* dated August 3, 1984, entered by the United States District Court for the Northern District of Texas; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Motion

<sup>1</sup> The last four digits of Inspired Healthcare Capital Holdings, LLC's federal tax identification number are 6696. There are 161 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://dm.epiq11.com/InspiredHealthcare>. The Debtors' mailing address is 7033 East Greenway Parkway, Suite 250, Scottsdale, AZ 85254.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

having been given under the particular circumstances; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby:

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is GRANTED as set forth herein.
2. Emerson shall produce the documents and other information set forth in the Requests to the offices of McDermott Will & Schulte LLP, 2801 N Harwood St., Suite 2600, Dallas, TX 75201, on or before April 3, 2026 or by such other date as may be reasonably agreed upon by the parties.
3. The Debtors are authorized to take all such actions as are necessary or appropriate to implement the terms of this Order.
4. This Court shall retain jurisdiction to resolve any disputes arising under or related to this Order, including any discovery disputes that may arise between or among the parties, and to interpret, implement, and enforce the provisions of this Order.
5. This Order is without prejudice to the rights of the Debtors to apply for other or further discovery from Emerson, any party in interest, or other entity or person.

### END OF ORDER ###

Prepared and presented by

s/ Marcus A. Helt

Marcus A. Helt (TX 24052187)

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*Proposed Counsel to the Debtors and  
Debtors-in-Possession*

**Exhibit B**

**Requests for Production**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<p>In re:</p> <p>INSPIRED HEALTHCARE CAPITAL HOLDINGS, LLC, <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	<p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p> <p>)</p>	<p>Chapter 11</p> <p>Case No. 26-90004 (MXM)</p>
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**REQUESTS FOR PRODUCTION OF DOCUMENTS ON EMERSON EQUITY, LLC**

Please take notice that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, Inspired Healthcare Capital Holdings, LLC and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned Chapter 11 cases (collectively, the “Debtors”), hereby serves the following requests for production on Emerson Equity, LLC, to be produced to the Debtors in accordance with the Definitions and Instructions below.

**DEFINITIONS**

1. “Board” means the Board of Directors of Emerson, including any committees thereof, and any individual director or officer serving on the Board during the relevant time period.
2. “Communication(s)” means any written or oral communication of any kind or character, including, by way of example and without limitation, e-mails, instant messages, text messages, voicemail or voice messages, audio recordings, recordings, transcripts or notes of in-person, video or telephone conversations, letters, meetings, memoranda, telegraphic and telex

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<sup>1</sup> The last four digits of Inspired Healthcare Capital Holdings, LLC’s federal tax identification number are 6696. There are 161 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://dm.epiq11.com/InspiredHealthcare>. The Debtors’ mailing address is 7033 East Greenway Parkway, Suite 250, Scottsdale, AZ 85254.

communications or transmittals of Documents, whether such communication was sent, received, or created, in final or in draft, and all Documents concerning or memorializing such written or oral communications.

3. “Concerning” means consisting of, reflecting, referring to, concerning, related to, involving, evidencing, constituting, or having any legal, logical, evidential, or factual connection with (whether to support or rebut) the subject matter designated in any of these requests. A request for Documents “Concerning” a specified subject matter always shall include Communications, notes, and memoranda (whenever prepared) concerning the subject matter of the request.

4. “Document(s)” means, without limitation, the original and all copies, prior drafts, and translation of information in any written, typed, printed, recorded or graphic form, however produced or reproduced, of any type or description, regardless of origin or location, including without limitation, all ESI, Communications, records, tables, charts, analyses, graphs, schedules, reports, memoranda, notes, lists, calendar and diary entries, letters (sent or received), contracts, statements, bills, checks, vouchers, video tapes, photographs, tape recordings, other mechanical records, transcripts or logs of any such recordings, and all other data compilations from which information can be obtained. The term “Document(s)” is intended to be at least as broad in meaning and scope as the usage of the term in or pursuant to the Federal Rules of Civil Procedure.

5. “Emerson” means Emerson Equity, LLC and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

6. “ESI” means Electronically Stored Information.

7. “Petition Date” means February 2, 2026.

8. “Holdings” or “Debtor” means Inspired Healthcare Capital Holdings, LLC and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases, and any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of them, and any and all officers, directors, executives, employees, representatives, agents, advisors, attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

9. “You” or “Your” means the entity or person responding to these Requests, and, if an entity, any direct or indirect predecessors or successors in interest, parents, subsidiaries or affiliates of any of any such entity, and any and all partners, officers, directors, executives, shareholders, members, employees, representatives, agents, advisors attorneys, and all other persons and entities acting or purporting to act on behalf of any of the foregoing.

### **INSTRUCTIONS**

1. Unless otherwise indicated, all Documents shall be produced for the relevant time period, which shall be the four (4) years before the Petition Date (*i.e.*, February 2, 2022) until the date of service of these Requests, including any Documents having an earlier origin, if in use during the relevant time period.

2. The obligation to produce Documents responsive to these Requests shall be continuing in nature, and a producing party is required promptly to produce any Documents requested herein that it locates or obtains after responding to these Requests, up to the conclusion of the above-captioned Chapter 11 case.

3. You are requested to produce not only those Documents in Your physical possession, but also those Documents as to which have the legal right and/or practical ability to obtain (and that are thus within Your custody and/or control), including, without limitation,

Documents in the possession of Your agents, employees, affiliates, advisors, or consultants and any other person or entity acting on Your behalf.

4. If You have no Documents responsive to a particular Request, or if for some other reason You are unable to produce responsive Documents, Your response to that Request should specifically so state. You must respond to each and every Request herein. Any objection to a Definition, Instruction or Request shall state with specificity all grounds for the objection. If You have certain Documents that are responsive to a Request, but believe that additional Documents not now available to You would also be responsive, You should provide the Documents You now have and specifically state when the remainder of the Documents will be provided.

5. Where a claim of privilege is asserted in objecting to the production of any Document and a Document called for by these Requests is withheld on the basis of such assertion, the objecting party shall identify the nature of the privilege (including work product) that is being claimed. In addition, the objecting party shall provide the following information with respect to any Document so withheld on its privilege log: (i) type of Document, *e.g.*, letter or memorandum; (ii) general subject matter of the Document and basis for privilege; (iii) date of the Document; and (iv) author, addressee(s) or recipient(s) of the Document. Attachments to privileged emails shall be independently assessed for privilege claims and logged individually (*i.e.*, separately from the email).

6. In the event that a requested Document has been lost, destroyed, discarded and/or otherwise disposed of, You shall identify the Document by identifying: (i) its author or preparer; (ii) all persons to whom it was distributed or shown; (iii) date; (iv) subject matter; (v) attachments or appendices; (vi) date, manner, and reason for destruction or other disposition; (vii) person

authorizing destruction or other disposition; and (viii) the Document request or requests to which the Document is responsive.

7. Instructions regarding the production format of Documents is attached as Appendix I.

8. The parties shall confer to develop search parameters, including custodians and search terms, to identify responsive Documents.

### **DOCUMENTS REQUESTED**

1. Documents sufficient to show the corporate structure of Emerson and its affiliates and subsidiaries, including the directors, officers, and board members of each of the foregoing.

2. All contracts between Emerson and Holdings.

3. Documents sufficient to show any and all transfer of funds by Emerson to or from Holdings, its affiliates, subsidiaries, and directors or officers of the foregoing.

4. All Documents and Communications with or regarding Holdings, its affiliates, subsidiaries, and directors or officers of the foregoing.

5. All Documents and Communications Concerning any ethical walls that were put in place, or any similar restrictions, with respect to Emerson and Patrick Lam.

6. Documents sufficient to show commissions and fees paid by Emerson to Patrick Lam, or any other employee of Holdings.

7. All Documents and Communications between or among Emerson, Holding and any investor or potential investor.

8. All Communications, including but not limited to texts, WhatsApp, or other instant messages (including those sent through Gmail, Facebook, iMessage, Blackberry Messenger (BBM), Yahoo, AOL, X (formerly known as Twitter), or any other service provider) between You

and any director(s), officer(s), or executive(s) of Holdings, Emerson, or any third party, Concerning Holdings, its bankruptcy, its business, including but not limited to, its private-placement offerings, promissory notes, senior-living facilities, development projects, trust agreements, intercompany liens, and investor distributions.

9. All insurance policies and indemnification agreements that cover or potentially apply to claims arising from Your service as a broker-dealer for Holdings, and all coverage correspondence with any insurer.

10. All Documents produced to and transcripts of any testimony or interview given to any state or federal regulator, prosecutor, or administrative agency in connection with any civil or criminal investigations of Holdings, including any investigation of Your role as a broker-dealer for Holdings.

11. All Board materials, minutes, presentations, resolutions and memoranda prepared, distributed, or reviewed by You during the relevant time period, including any drafts thereof and any hardcopy version containing any handwritten mark or notation Concerning Holdings or Patrick Lam.

12. All Documents and Communications produced by You to any third party in response to any discovery request in this Bankruptcy Proceeding, including but not limited to a Rule 2004, subpoena, or request for production.

Dated: Dallas, Texas  
March 13, 2026

**MCDERMOTT WILL & SCHULTE LLP**

/s/ Marcus A. Helt  
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*Proposed Counsel to the Debtors and Debtors-in-Possession*

## APPENDIX I

### TECHNICAL SPECIFICATIONS FOR PRODUCTION

#### PRODUCTION OF DOCUMENTS ORIGINATING AS PAPER

For documents that have originated in paper format, the following specifications should be used for their production.

- Images should be produced as single page TIFF group IV format imaged at 300dpi.
- Each filename must be unique and match the Bates number of the page. The filename should not contain any blank spaces and should be zero padded (for example ABC00000001).
- Media may be delivered on CDs, DVDs, or External USB hard drives. Each media volume should have its own unique name and a consistent naming convention (for example ZZZ001 or SMITH001).
- Each delivery should be accompanied by an image cross reference file that contains document breaks.
- A delimited text file that contains available fielded data should also be included and at a minimum include Beginning Bates Number, Ending Bates Number, Custodian, and Number of Pages. The delimiters for that file should be:  
  
Field Separator, ASCII character 020: “|”  
  
Quote Character, ASCII character 254 “b”  
  
Multi-Entry Delimiter, ASCII character 059: “;”
- To the extent that documents have been run through an Optical Character Recognition (OCR) software in the course of reviewing the documents for production, full text should also be delivered for each document. Text should be delivered on a document level in an appropriately formatted text file (.txt) that is named to match the first Bates number of the document.
- A text cross reference load file should also be included with the production delivery that lists the beginning Bates number of the document and the relative path to the text file for that document on the production media.

## PRODUCTION OF EMAIL AND ELECTRONIC DOCUMENTS

Electronic documents should be produced in such fashion as to identify the location (*i.e.*, the network file folder, hard drive, back-up tape or other location) where the documents are stored and, where applicable, the natural person in whose possession they were found (or on whose hardware device they reside or are stored). If the storage location was a file share or work group folder, that should be specified as well.

Attachments, enclosures, and/or exhibits to any parent documents should also be produced and proximately linked to the respective parent documents containing the attachments, enclosures, and/or exhibits.

For standard documents, emails, and presentations originating in electronic form, documents should be produced as tiff images using the same specifications above with the following exceptions:

- Provide a delimited text file (using the delimiters detailed above) containing the following extracted metadata fields where they exist in the file being produced:

Beginning Production  
Number Ending Production  
Number Beginning  
Attachment Range Ending  
Attachment Range Custodian

Custodian\_ALL  
Confidentiality  
Designation Original  
Location Path Email  
Folder Path Document  
Type Edoc\_Author

Edoc\_Title  
Page Count  
File Name  
File  
Extension  
File Size  
MD5 Hash

Date Last Modified

Time Last Modified  
[HH:MM:SS] Date Created

Time Created [HH:MM:SS]

Date Last Accessed

Date Sent

Time Sent [HH:MM:SS]

Date Received

Time Received

[HH:MM:SS] From

Recipients

Copyees

Blind Copyees

Email Subject

Path to Native

File

Calendar Start Date

Calendar End Date

- Images shall be produced revealing any hidden text/content.
- Extracted full text (not OCR text) should also be delivered for each electronic document. The extracted full text should be delivered on a document level according to the specifications above similar to paper documents.
- Foreign language text files and metadata should be delivered with the correct encoding to enable the preservation of the documents' original language.
- All spreadsheets should be produced in their native format and in the order that they were stored in the ordinary course of business, *i.e.*, emails that attach spreadsheets should not be separated from each other and should be linked using the Attachment Range fields above. The extractable metadata and text should be produced in the same manner as other documents that originated in electronic form. A placeholder TIFF image shall be created, Bates numbered, and the produced Excel chart shall be renamed to match the Bates number on its corresponding placeholder page. The exception shall be for redacted spreadsheets which shall be produced in TIFF format. Images for the redacted spreadsheets shall display the content in the same manner as if it were printed. The parties agree to work out a future protocol governing the use and format of documents produced pursuant to this paragraph at trial, depositions, or hearings (such as converting to tiff images in accordance with the above protocol).
- Upon review, the requesting party may ask for certain other documents and/or databases that were initially produced in their tiff or pdf format to be produced

in their native format in the event that the tiff or pdf version is not reasonably usable. If this is the case, the requesting party will submit a list of Bates numbers identifying the documents. The documents should be produced in their unaltered native format with an accompanying text delimited text file (using the delimiters above) that contains the following fields:

Beginning Production  
Number Ending Production  
Number Beginning  
Attachment Range Ending  
Attachment Range Path to  
Native File

MD5 Hash Value

#### PRODUCTION OF DATABASES AND OTHER STRUCTURED DATA

Generally, databases should be produced in a mutually agreeable data exchange format. To determine the data that is relevant to the document requests, a list of databases and systems used to manage relevant data should be provided with the following information:

Database Name

Type of Database

Software Platform

Software Version

Business Purpose Users

Size in Records Size in Gigabytes

A List of Standard Reports

Database Owner or Administrator's Name Field List

Field Definitions (including field type, size, and use)

Upon review of the list, the parties agree to meet and confer regarding the data to be produced from each source, if any, and the form(s) of the production thereof.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2026, a copy of Inspired Healthcare Capital Holdings, LLC and certain of its affiliates and subsidiaries' Requests for Production of Documents on Emerson Equity LLC was served via email and/or FedEx at the address listed for Emerson Equity LLC at:

155 Bovet Road, Suite 725  
San Matea, CA 94402 US

By: /s/ Marcus A. Helt  
Marcus A. Helt