

**SILLS CUMMIS & GROSS P.C.**

Honorable Frank L. Kurtz

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**POLSINELLI PC**

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*Proposed Co-Counsel for the Official  
 Committee of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT  
 EASTERN DISTRICT OF WASHINGTON**

In re

Lead Case No. 19-01189-11

ASTRIA HEALTH, et al.,

Jointly Administered

Debtors.<sup>1</sup>

**DECLARATION OF JANE PEARSON  
 IN SUPPORT OF OFFICIAL  
 COMMITTEE OF UNSECURED  
 CREDITORS' APPLICATION FOR  
 ORDER APPROVING  
 EMPLOYMENT OF POLSINELLI PC  
 NUNC PRO TUNC TO MAY 23, 2019**

<sup>1</sup> The Debtors, along with their case numbers, are as follows: Astria Health (19-01189-11), Glacier Canyon, LLC (19-01193-11), Kitchen and Bath Furnishings, LLC (19-01194-11), Oxbow Summit, LLC (19-01195-11), SHS Holdco, LLC (19-01196-11), SHC Medical Center - Toppenish (19-01190-11), SHC Medical Center - Yakima (19-

DECLARATION OF JANE PEARSON-1



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Jane Pearson, a shareholder of Polsinelli PC, makes this Declaration under 28 U.S.C. § 1746 and states:

1. I am a Shareholder in the Seattle, Washington office of Polsinelli PC (“**Polsinelli**”), which maintains offices for the practice of law at 1000 2nd Ave, Suite 3500, Seattle, Washington 98104, among numerous other locations throughout the United States. I am an attorney-at-law, duly admitted and in good standing to practice in the State of Washington, the United States Court of Appeals for the Ninth Circuit, the United States District Court for the Eastern District of Washington and the United States District Court for the Western District of Washington.

2. Polsinelli is an AmLaw 100 national full-service law firm with over 850 lawyers and 22 offices that is a recognized leader in the areas of health care, financial services (including all aspects of debt from origination through enforcement and bankruptcy), real estate, litigation, and business. Polsinelli has approximately 30 lawyers dedicated to its national bankruptcy and financial restructuring practice and was recently recognized by Chambers USA in Band 4 for Delaware Bankruptcy/Restructuring and individual attorney recognition in Seattle, Delaware, Atlanta, Chicago, and Los Angeles.

3. Polsinelli has extensive experience in numerous other chapter 11 bankruptcy cases including, *inter alia*, recent engagements as: lead counsel to the Official Committee of Unsecured Creditors of L.K. Bennett U.S.A., Inc.; lead

01192-11), Sunnyside Community Hospital Association (19-01191-11), Sunnyside Community Hospital Home Medical Supply, LLC (19-01197-11), Sunnyside Home Health (19-01198-11), Sunnyside Professional Services, LLC (19-01199-11), Yakima Home Care Holdings, LLC (19-01201-11), and Yakima HMA Home Health, LLC (19-01200-11).

DECLARATION OF JANE PEARSON-2



1 counsel to the Official Committee of Unsecured Creditors of Cherry Bros., LLC  
2 d/b/a Cherrydale Farms, *et al.*; bankruptcy counsel and conflicts counsel to the  
3 Official Committee of Vestis Retail Group, LLC and eight of its subsidiaries and  
4 affiliated debtors; bankruptcy counsel and conflicts counsel to the Official  
5 Committee of Golfsmith International Holdings, Inc. and its debtor affiliates;  
6 bankruptcy counsel and conflicts counsel to the Official Committee of TCEH  
7 Unsecured Creditors of Energy Future Competitive Holdings Company LLC,  
8 Texas Competitive Electric Holdings Company LLC, and their direct and indirect  
9 subsidiaries; bankruptcy counsel and conflicts counsel to the Official Committee of  
10 Unsecured Creditors of VGR Liquidating, LLC and its affiliated Debtors;  
11 bankruptcy counsel and conflicts counsel to the Official Committee of Unsecured  
12 Creditors of Santa Fe Gold Corporation; bankruptcy counsel and conflicts counsel  
13 to the Official Committee of Allied Nevada Gold Corp.; Co-counsel to the Official  
14 Committee of Student Creditors in Corinthian Colleges; Lead Counsel to the  
15 Official Committee of Unsecured Creditors of H. Krevit Company, Inc., *et al.*;  
16 Lead Counsel to the Official Committee of Unsecured Creditors of Osage  
17 Exploration and Development, Inc.; bankruptcy counsel to the Official Committee  
18 of Unsecured Creditors of The Standard Register Company; Bankruptcy Counsel  
19 to the Official Committee of Unsecured Creditors of Saab Cars North America;  
20 bankruptcy counsel to the Official Committee of Unsecured Creditors of  
21 Simplicity, LLC; Lead counsel to the Official Committee of Unsecured Creditors  
22 of Open Range Communications, Inc.; Lead counsel to the Official Committee of  
23 Unsecured Creditors of Ultimate Escapes, LLC; and Lead counsel to the Official  
24 Committee of Unsecured Creditors of Crossroads Wireless, among many other  
25 engagements.

26 DECLARATION OF JANE PEARSON-3



1           4. I submit this declaration (the “**Declaration**”)<sup>2</sup> for the application (the  
2 “**Application**”) of the Official Committee of Unsecured Creditors (the  
3 “**Committee**”) appointed on May 23, 2019, in the above-captioned chapter 11  
4 cases of Astria Health and its debtor affiliates, the debtors and debtors in  
5 possession (the “**Debtors**”) for an order approving the retention of Polsinelli as co-  
6 counsel to the Committee *nunc pro tunc* to May 23, 2019, and to provide the  
7 disclosures required under § 1103 of title 11 of the United States Code (the  
8 “**Bankruptcy Code**”), Rules 2014(a) and 2016(b) of the Federal Rules of  
9 Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Local Rule 2014-1 of the  
10 Local Rules for the United States Bankruptcy Court for the Eastern District of  
11 Washington (the “**Local Rules**”).

12           5. I incorporate by reference the Application as if it were set forth in full  
13 herein.

14           6. Unless otherwise stated in this Declaration, I have personal  
15 knowledge of the facts hereinafter set forth. If any information disclosed requires  
16 amendment or modification upon Polsinelli’s completion of further analysis or as  
17 additional creditor information becomes available to Polsinelli, a supplemental  
18 declaration will be submitted to this Court.

19           7. In connection with the proposed retention by the Committee in the  
20 Cases, Polsinelli reviewed the bankruptcy petition, the list of 30 largest unsecured  
21 creditors, the list of secured creditors, and other interested parties with the  
22 information available through Polsinelli’s client database. A list of the entities  
23 searched is attached hereto as Exhibit 1. Polsinelli has, and is continuing to,  
24 \_\_\_\_\_

25 <sup>2</sup> All terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.  
26

1 examine its client database to determine whether it had or has any connections with  
2 the aforementioned parties in interest.

3 8. Where I have been able to ascertain, neither I, nor Polsinelli, nor any  
4 shareholder, counsel, of counsel, senior partner, or associate of Polsinelli,  
5 represents any other party in interest in the Cases, or their attorneys or accountants,  
6 except as set forth on Exhibit 2. Further, Polsinelli has no connection (as such  
7 term is used in Bankruptcy Code § 101(14) and Bankruptcy Rule 2014(a)) with the  
8 Debtors, their creditors, any other party in interest, the Debtors' current respective  
9 attorneys or professionals, the United States Trustee, or any person employed in  
10 the Office of the United States Trustee, nor does Polsinelli hold any adverse  
11 interest or represent any entity having an adverse interest with the Cases except as  
12 disclosed herein.

13 9. To the extent set forth on the Disclosures attached hereto, I, Polsinelli,  
14 and certain of its shareholders, counsel, of counsel, senior partners, and associates  
15 may represent, or may have previously represented, and may represent, persons,  
16 entities, and their affiliates that are claimants, interest holders, other parties in  
17 interest, or professionals of the Debtors (and other professionals to be retained in  
18 the Cases) in matters totally unrelated to the Debtors or the Cases.

19 10. Attached hereto as Exhibit 2 is a list of parties in interest that  
20 Polsinelli has represented in the past, represents, or may continue to represent in  
21 matters wholly unrelated to the Cases.

22 11. As set forth on Exhibit 2, Polsinelli represents UMB Bank, N.A.  
23 ("UMB") in matters unrelated to the Cases. In the Cases, UMB Bank, N.A. is an  
24 indenture trustee under a bond indenture.

25  
26 DECLARATION OF JANE PEARSON-5

1        12. The matters in which Polsinelli has previously represented and  
2 currently represents UMB are completely and totally unrelated to the Cases. None  
3 of the Polsinelli attorneys who are representing the Committee in the Cases have  
4 worked on UMB files. In calendar year 2017, 0.01% of Polsinelli's annual  
5 revenue came from the representation of UMB. In calendar year 2018, 0.02% of  
6 Polsinelli's annual revenue came from the representation of UMB.

7        13. UMB has executed an appropriate waiver relating to Polsinelli's  
8 representation of UMB on unrelated matters, and no Polsinelli attorney who  
9 represents UMB will have any involvement whatsoever in the representation of the  
10 Committee in the Cases. Polsinelli will request an appropriate waiver from the  
11 Committee if necessary.

12        14. Polsinelli is a "disinterested person" as that term is defined in  
13 Bankruptcy Code § 101(14) in that Polsinelli, its shareholders, counsel, and  
14 associates:

- 15            a. are not creditors, equity security holders, or insiders;
- 16            b. are not and were not, within two (2) years before the date of the filing  
17                of the petitions, directors, officers, or employees of the Debtors; and
- 18            c. do not have interests materially adverse to the interests of the estates  
19                or of any class of creditors or equity security holders, by reason of any  
20                direct or indirect relationship to, connection with, or interest in, the  
21                Debtors, or for any other reason.

22        15. By the foregoing, Polsinelli is eligible for employment and retention  
23 by the Committee under the Bankruptcy Code and the Bankruptcy Rules.

24        16. The professional services that Polsinelli has rendered and may render  
25 for the Committee include, without limitation:

26        DECLARATION OF JANE PEARSON-6

1 (a) providing legal advice regarding the powers and duties  
2 available to the Committee;

3 (b) investigating of the acts, conduct, assets, liabilities and financial  
4 condition of the Debtors, the operation of the Debtors' businesses, and any other  
5 matter relevant to the Cases or to the formulation of a plan or plans of  
6 reorganization or liquidation;

7 (c) preparing on behalf of the Committee necessary applications,  
8 motions, complaints, answers, orders, agreements and other legal papers;

9 (d) reviewing, analyzing and assisting the Committee in responding  
10 to all pleadings filed by the Debtors or other parties in interest and appearing in  
11 Court to present necessary motions, applications and pleadings and to otherwise  
12 protect the interest of the Committee;

13 (e) consulting with the Debtors and their professionals, other  
14 parties in interest and their professionals, and the United States Trustee concerning  
15 the administration of the Debtors' estates;

16 (f) representing the Committee in hearings and other judicial  
17 proceedings;

18 (g) advising the Committee on practice and procedure in the United  
19 States Bankruptcy Court for the Eastern District of Washington and regarding the  
20 Local Rules and local practice; and

21 (h) performing all other legal services for the Committee in  
22 connection with the Cases.

23 17. Polsinelli has advised the Committee that its hourly rates for this  
24 engagement will be comparable to the hourly rates being charged by Debtors' local  
25 counsel, which represents a discount to Polsinelli's rates for other similarly  
26

DECLARATION OF JANE PEARSON-7

1 situated clients on similar matters. Polsinelli's standard rates for its professionals  
2 currently range from \$365–\$940 per hour for shareholders, from \$275–\$690 per  
3 hour for non-shareholder attorneys (including associates and counsel), and from  
4 \$145–\$345 per hour for paraprofessionals. The identity of the professionals  
5 Polsinelli currently anticipates providing services in the Cases, and their current  
6 hourly rates for this engagement are:

7           Shareholders: Jane Pearson       \$550

8                               Randy Soref     \$550

9           Associates: Caryn Wang       \$340

10                           Tanya Behnam   \$335

11          Paraprofessionals:               \$265.

12 There may be additional professionals whose services will be required for this  
13 engagement. These hourly rates are subject to periodic adjustment to reflect  
14 economic and other conditions. Polsinelli will seek reimbursement of travel  
15 expenses as set forth in paragraph 19 below.

16           18. These rates are set at a level designed to compensate Polsinelli fairly  
17 for the work of its attorneys and paralegals, and to cover fixed and routine  
18 overhead expenses.

19           19. It is Polsinelli's policy to charge its clients in all areas of practice for  
20 all other expenses incurred in connection with the client's case. The expenses  
21 charged to clients include, among other things, telephone charges, printing and  
22 scanning charges, toll charges, mail and express mail charges, special or hand  
23 delivery charges, photocopying charges, travel expenses, expenses for "working  
24 meals," computerized research, and transcription costs, and non-ordinary overhead  
25 expenses such as overtime for secretarial personnel and other staff. Polsinelli will

26 DECLARATION OF JANE PEARSON-8



1 charge for these expenses in a manner and at rates consistent with charges made  
2 generally to the firm's other clients and with local practice. With respect to airfare  
3 (should it be needed), Polsinelli will seek reimbursement only to the extent of the  
4 cost of economy-type tickets prevailing on the date of travel.

5 20. No promises have been received by Polsinelli or by any shareholder,  
6 counsel, of counsel, or associate thereof on payment or compensation for the Cases  
7 other than under the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules.  
8 Polsinelli has no agreement with any other entity to share with such entity any  
9 compensation received by Polsinelli for the Cases, other than with the  
10 shareholders, counsel, and associates of Polsinelli.

11 21. While Polsinelli has taken reasonable steps to ascertain whether past  
12 and current clients are creditors of the Debtors, affiliated with the Debtors, or are  
13 otherwise parties in interest, Polsinelli's analysis is ongoing. Polsinelli will  
14 supplement this Declaration as necessary.

15 22. The Office of the United States Trustee has adopted Guidelines for  
16 Reviewing Applications for Compensation and Reimbursement of Expenses Filed  
17 under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases (the "**UST**  
18 **Guidelines**"). The UST Guidelines apply to the U.S. Trustee's review of  
19 applications for compensation filed by attorneys in larger chapter 11 cases and are  
20 intended as an update to the original guidelines adopted in 1996.

21 23. Polsinelli responds to the following questions in the UST Guidelines  
22 in compliance with paragraph D, section 1 as follows:

23 a. **Question:** Did you agree to any variations from, or alternatives to,  
24 your standard or customary billing arrangements for this engagement?

25 **Response:** Polsinelli advised the Committee that it would maintain  
26

DECLARATION OF JANE PEARSON-9

1 hourly rates comparable to those of Debtors' local counsel in the  
2 Cases.

- 3 b. **Question:** Do any of the professionals included in this engagement  
4 vary their rate based on the geographic location of the bankruptcy  
5 case?

6 **Response:** No. Polsinelli does maintain different rates for its  
7 professionals but those rates are not based on the geographic location  
8 of the bankruptcy Cases or the client.

- 9 c. **Question:** If you represented the client in the 12 months prepetition,  
10 disclose your billing rates and material financial terms for the  
11 prepetition engagement, including any adjustments during the 12  
12 months prepetition. If your billing rates and material financial terms  
13 have changed postpetition, explain the difference and the reasons for  
14 the difference.

15 **Response:** Polsinelli did not represent the client prepetition.

- 16 d. **Question:** Has your client approved your prospective budget and  
17 staffing plan, and, if so, for what budget period?

18 **Response:** The Committee has reviewed the budget for the period of  
19 the week ending May 11, 2019 through the week ending August 10,  
20 2019, attached as Exhibit B to Exhibit 1 to the *Interim Order (i)*  
21 *Authorizing the Debtors to Obtain Postpetition Financing; (ii)*  
22 *Granting Security Interests and Superpriority Administrative Expense*  
23 *Status; (iii) Granting Adequate Protection to Certain Prepetition*  
24 *Secured Credit Parties; (iv) Modifying the Automatic Stay; (v)*  
25 *Authorizing the Debtors to Enter Into Agreements with JMB Capital*  
26

*Partners Lending, LLC; (vi) Authorizing Use of Cash Collateral; (vii) Scheduling a Final Hearing and (viii) Granting Related Relief* [Dkt. #82], which includes a line item for professional fees. Polsinelli intends to submit a budget and staffing plan consistent with the form identified as Exhibit C to U.S. Trustee Guidelines for approval to the Committee in the normal course of its representation.

24. By the foregoing, Polsinelli is eligible for employment and retention by the Committee under Bankruptcy Code §§ 328 and 1103 and the Bankruptcy Rules.

I certify under penalty of perjury under the laws of the United States that, to the best of my knowledge and after reasonable inquiry, the foregoing is true and correct.

Dated: June 18, 2019  
Seattle, Washington

/s/ Jane Pearson  
Jane Pearson

**EXHIBIT 1**

List of Searched Parties

**Astria Health - Interested Parties List**

## POLSINELLI DISCLOSURES

### **Debtors**

Astria Health  
SHC Medical Center – Toppenish  
Sunnyside Community Hospital  
Association  
SHC Medical Center – Yakima  
Glacier Canyon, LLC  
Kitchen and Bath Furnishings, LLC  
Oxbow Summit, LLC  
SHC Holdco, LLC  
Sunnyside Community Hospital  
Home Medical Supply  
Sunnyside Home Health  
Sunnyside Professional Services, LLC  
Yakima HMA Home Health, LLC  
Yakima Home Care Holdings, LLC

### **Debtor Affiliates/DBAs/FKAs**

Astria Sunnyside Hospital  
Astria Regional Medical Center  
Astria Toppenish Hospital  
Astria Health Centers  
Ambulatory Surgical Center  
Astria Hearing and Speech  
Astria Home Health and Hospice  
Sunnyside Healthcare  
Sanovida, LLC  
Toppenish Community Hospital  
Astria Toppenish Hospital  
Astria Regional Medical Center  
Sunnyside Community Hospital  
Association  
Sunnyside Community Hospitals &  
Clinics  
Astria Sunnyside Hospital  
Astria Home Health

AH NP1  
AH NP2  
AH NP3  
AH NP4  
AH NP5  
AH NP6  
AH NP7  
AH NP8  
AH NPP  
Bridal Dreams, LLC  
Caravan Health ACO. 19, LLC  
Astria Health Clinically Integrated  
Networks, LLC  
Depot Plus  
Home Supply, LLC  
Kitchen Appliance, LLC  
Northwest Health, LLC  
Pacific Northwest ASC Management  
Sunnyside Hospital Foundation  
Sunnyside Hospital Service Corp.  
Sunnyside Medical Center, LLC  
Wedded Bliss, LLC  
Yakima HMA Physician  
Management, LLC

### **Debtor Professionals**

Dentons US LLP  
Bush Kornfeld LLP  
Kurtzman Carson Consultants LLC  
("KCC")

### **Officers and Trustees**

Michael Lane  
John Gallagher  
Cary Rowan  
John Anderson

Les Abercrombie III  
Daniel Burtnett  
Joe Ketterer  
Dawn R. O'Polka  
Mary Ann Bliesner  
Derek Kieta  
Ryan Maxwell  
Tom Strohm  
Darrin Cook  
Mark Hartman  
Sara Williamson  
Maureen Adkinson  
Mark Silverstein  
James Abbenhaus  
John Adkinson  
Richard Edgerly

Noel Moxley  
Darlene Picatti  
Brian Gibbons  
Eric Stokes  
Michael Long  
Cynthia Lewis  
Peggy Brewer  
Cus Arteaga  
Jonathan G. Mercer  
Ana Garcia  
David Shoemaker  
Eric Jensen  
Kyla Wright  
Terra Palomarez  
Rhonda Wellner  
Beth Ortega  
Carrie Story  
Aaron Grigg  
Lori Alvord  
Maxine Janis  
Steve Young

### **30 Largest Creditors**

Community Health System  
Medefis Consolidated  
Washington State Healthcare  
Authority  
GE Healthcare Equip Finance  
Cerner Corporation  
Washington Emergency Room  
Central Washington Family Medicine  
Locum Tenens.com  
Medtronic USA Inc.  
Morrison Management Specialist  
Stryker Orthopaedics  
Biotronik Inc.  
Apogee Medical Management  
CompuHealth Associates Inc.  
Johnson & Johnson Health Care Sys  
Inc.  
Theorem Architecture  
Healthtech Management Services  
Physicians Insurance  
Zimmer US Inc  
Allied Universal Security Srvs  
  
Fastaff, LLC  
GE Healthcare WI  
Derek Weaver  
Medline Dept 1080  
Earl Architects  
Davita Renal Treatment Centers –  
WE  
GE Healthcare IITS USA Corp.  
Boston Scientific Corporation  
Pacific Power  
Medpartners HMA LLC

### **Alleged Secured Creditors**

JMB Capital  
JMB Financial Advisors  
Banner Bank  
MidCap Financial Trust  
MidCap Funding IV Trust  
UMB Bank  
Lapis Advisers LP  
GE HFS LLC

### **Utilities**

Allstream  
Benton REA  
Cascade Natural Gas  
Centurylink  
Charter  
City of Grandview  
City of Prosser  
City of Sunnyside  
City of Toppenish  
City of Union Gap  
City of Wapato  
City of Yakima  
Consolidated Communications  
DirecTV  
Dish  
IGI Resources, Inc.  
Pacific Power  
Sound Telecom  
Stericycle  
Terrace Heights Sewer Dist.  
  
Wide Hollow Development  
Yakima County Public Services  
Yakima Waste Systems

### **Banks**

Bank of America  
Banner Bank  
Heritage Bank  
Lower Valley Credit Union  
US Bank  
Wells Fargo

### **Other Interested Parties**

Favorite Healthcare Staffing  
American College of Cardiology  
Foundation  
AHM, Inc.  
Washington State Nurses Association  
SEIU Healthcare 1199NW  
TIAA Commercial Finance, Inc.  
Healthcare Resource Group, Inc.  
Med One Capital Funding, LLC  
Copiers Northwest, Inc.  
OXARC, Inc.  
Washington State Nurses Association  
Engage f/k/a Inland Northwest Health  
Services  
Theorem Architecture PLLC  
Jim McCommon  
McCommon Leasing Company  
V.K. Powell Construction, LLC  
Yakima Valley Memorial Hospital  
Milroy Emergency Group, PLLC  
Advanced Transfusion Services  
All Points Capital Corporation  
American West Bank  
Baxter Healthcare Corporation  
First Republic Bank  
General Electric Capital Corporation  
Home Security Bank



Johnson & Johnson Finance  
Corporation  
Leasing Associates of Barrington, Inc.  
MB Financial Bank, N.A.

Navitas Credit Corp.  
Olympus America, Inc.  
Ortho-Clinical Diagnostics, Inc.  
Riverbank  
Siemens Diagnostics Finance Co.,  
LLC  
Space Investment Partners  
Stryker Sales Corporation  
Washington Health Care Facilities  
Authority  
Wintrust Equipment Finance  
American West Bank Holdings, Inc.  
ASD Specialty Healthcare LLC  
Corporation Service Company  
Fidelity Title Company  
First American Title Insurance  
Company  
MBI Construction Services, Inc.  
Schreiner Title Company  
Terumo Medical Corporation

**Acting U.S. Trustee (Region 18)**

Gregory M. Garvin  
**Office of the U.S. Trustee (Regional  
and Spokane Offices)**  
Roy D. Hilmer

Jose D. Colon  
Bryan People  
Gary W. Dyer  
James Perkins  
Brian H. Moran  
Glori J. Gibford  
Phyllis J. Packwood  
Jeannie S. Olivas

**U.S. Bankruptcy Judges for the  
Eastern District of Washington**

Hon. Frederick P. Corbit (Chief  
Judge)  
Hon. Frank L. Kurtz

**U.S. District Judges for the Eastern  
District of Washington**

Hon. Thomas O. Rice (Chief Judge)  
Hon. Rosanna Malouf Peterson  
Hon. Stanley A. Bastian  
Hon. Salvador Mendoza Jr.  
Hon. Justin L. Quackenbush  
Hon. William Freeming Nieslen  
Hon. Fred Van Sickle  
Hon. Robert H. Whaley  
Hon. Edward F. Shea  
Hon. Lonny R. Suko  
Hon. Mary K. Dimke (Magistrate)  
Hon. John T. Rodgers (Magistrate)

POLSINELLI DISCLOSURES

**EXHIBIT 2**

(Polsinelli Disclosures)

| Name Searched                 | Category of Party in Interest | Comments and Status  |
|-------------------------------|-------------------------------|--|
| AHM, Inc.                     | Other Interested Party        | Polsinelli has in the past represented an affiliate of this entity in a matter wholly unrelated to the Debtors' Chapter 11 Cases                       |
| Bank of America, N.A.         | Bank                          | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases               |
| Banner Bank                   | Alleged Secured Creditor/Bank | Polsinelli currently represents AmericanWest Bank, which merged with Banner Bank in 2015, in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| Baxter Healthcare Corporation | Other Interested Party        | Polsinelli currently represents and has in the past represented affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| Biotronik, Inc.               | Creditor                      | Polsinelli has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases  |
| Caravan Health ACO, 19, LLC   | Debtor Affiliate              | Polsinelli currently represents Caravan Health Corporation in matters wholly unrelated to the Debtors' Chapter 11 Cases. An ACO is an Accountable Care |

|                                   |                        |  |
|-----------------------------------|------------------------|--|
|                                   |                        | Organization. Caravan Health ACO, 19, LLC is the entity ACO, 19, LLC set up for the relationship with Caravan Health Corporation. Polsinelli does not represent ACO, 19, LLC or Caravan Health ACO, 19, LLC. |
| Cerner Corporation                | Creditor               | Polsinelli currently represents and has in the past represented an affiliate of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases   |
| Charter                           | Utility                | Polsinelli currently represents and has in the past represented Charter Communications in matters wholly unrelated to the Debtors' Chapter 11 Cases  |
| Community Health Systems, Inc.    | Creditor               | Polsinelli has in the past represented this entity and its affiliates in matters wholly unrelated to the Debtors' Chapter 11 Cases   |
| Consolidated Communications, Inc. | Utility                | Polsinelli has in the past represented this entity in a matter wholly unrelated to the Debtors' Chapter 11 Cases   |
| Corporation Service Company       | Other Interested Party | This entity is or was the registered agent for a number of Polsinelli's clients in matters wholly unrelated to the Debtors' Chapter 11 Cases; Polsinelli represents an affiliate of this entity in           |

|   |                          |  |
|---|--------------------------|--|
|   |                          | matters wholly unrelated to the Debtors' Chapter 11 Cases  |
| Davita Renal Treatment Centers – WE       | Creditor                 | Polsinelli currently represents and has in the past represented affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases                 |
| First American Title Insurance Company    | Other Interested Party   | Polsinelli currently represents First American Title Insurance Company in matters wholly unrelated to the Debtors' Chapter 11 Cases                                    |
| MB Financial Bank                         | Other Interested Party   | Polsinelli currently represents and has in the past represented this entity and affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| Medefis Consolidated                      | Creditor                 | Polsinelli currently represents and has in the past represented affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases                 |
| Medtronic USA, Inc.                       | Creditor                 | Polsinelli has in the past represented affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases  |
| Midcap Financial Trust and Midcap Funding | Alleged Secured Creditor | Polsinelli currently represents and has in the past represented affiliates of these  |

|                                |                        |  |
|--------------------------------|------------------------|--|
| IV Trust                       |                        | entities in matters wholly unrelated to the Debtors' Chapter 11 Cases  |
| PacifiCorp d/b/a Pacific Power | Creditor               | Polsinelli has in the past represented an affiliate of this entity in a matter wholly unrelated to the Debtors' Chapter 11 Cases                       |
| Stericycle                     | Utility                | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases               |
| Stryker Orthopaedics           | Creditor               | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases               |
| Stryker Sales Corporation      | Other Interested Party | Polsinelli currently represents and has in the past represented affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| TIAA Commercial Finance, Inc.  | Other Interested Party | Polsinelli currently represents an affiliate of this entity in a matter wholly unrelated to the Debtors' Chapter 11 Cases                              |
| Terumo Medical Corporation     | Other Interested Party | Polsinelli has in the past represented affiliates of this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases                          |

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|--|--------------------------|--|
| UMB Bank, N.A.                         | Trustee/Secured Creditor | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| U.S. Bank                              | Bank                     | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| Wells Fargo                            | Bank                     | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |
| Yakima Valley Memorial Hospital        | Other Interested Party   | Polsinelli has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases                          |
| Zimmer US, Inc.<br>d/b/a Zimmer Biomet | Creditor                 | Polsinelli currently represents and has in the past represented this entity in matters wholly unrelated to the Debtors' Chapter 11 Cases |