

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<p><b>In re:</b></p> <p><b>NEIGHBORS LEGACY HOLDINGS, INC., <i>et al.</i>,</b></p> <p style="text-align: center;"><b>Debtors.<sup>1</sup></b></p>	§ § § § § § §	<p><b>Chapter 11</b></p> <p><b>Case No. 18-33836 (MI)</b></p> <p><b>(Jointly Administered)</b></p>
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**DEBTORS’ EXHIBIT AND WITNESS LIST**

The above-referenced debtors file this Exhibit and Witness List for the hearing to be held on September 24, 2018, at 9:00 a.m. in Courtroom 404 of the United States Courthouse, 515 Rusk Street, Houston, Texas 77002.

**EXHIBITS**

NO.	Description	M	O	O	A	W/D	Disposition After Trial
		a	f	b	d		
		r	f	j	m		
		k	e	e	i		
			r	c	t		
1.	Cure Objection Chart						
2.	AEC ER 4, LLC – evidence of adequate assurance of future performance						
3.	Amended Notice of Executory Contracts and Unexpired Leases Subject to Possible Assumption and Assignment and Proposed Cure Amounts						

<sup>1</sup> Due to the large number of Debtors in these chapter 11 cases, a complete list of the Debtors and the last four digits of their tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ proposed claims and noticing agent at [www.kccllc.net/neighbors](http://www.kccllc.net/neighbors). The location of Debtors’ principal place of business and the Debtors’ service address is: 10800 Richmond Avenue, Houston, Texas 77042.



NO.	Description	M a r k	O f f e r	O b j e c t	A d m i t	W/D	Disposition After Trial
4.	Any pleadings, reports, exhibits, transcripts, proposed orders, Court orders, or other documents filed in the above-captioned bankruptcy case						
5.	Any exhibit introduced by any other party						
6.	Rebuttal or impeachment exhibits as necessary						

**WITNESSES**

The Debtors may call the following witnesses at the Hearing:

1. Chad J. Shandler, Debtors’ proposed Chief Restructuring Officer
2. Tensie Axton, Chief Financial Officer
3. Luke Padwick, MD (AEC ER 4, LLC)
4. Rebuttal witnesses as necessary.
5. Any witness listed by any other party.

The Debtors reserve their right to amend or supplement this Exhibit and Witness List as necessary in advance of the Hearing.

Dated: Houston, Texas  
September 20, 2018

**PORTER HEDGES LLP**

By: /s/ John F. Higgins  
John F. Higgins  
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**COUNSEL FOR DEBTORS  
AND DEBTORS IN POSSESSION**

**CERTIFICATE OF SERVICE**

I certify that on September 20, 2018, I caused a copy of the foregoing document to be served by the Electronic Case Filing System in the United States Bankruptcy Court for the Southern District of Texas.

*/s/ John F. Higgins*

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John F. Higgins