

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
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PROTEUS DIGITAL HEALTH, INC.,	:	Case No. 20-11580 (BLS)
	:	
Debtor. ¹	:	
	:	Docket Nos. 3, 4, 5, 7, 8, 40, 41, 42, 44 & 45
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**OMNIBUS NOTICE OF SECOND DAY HEARING TO BE HELD ON
JULY 14, 2020 AT 11:30 A.M. (ET)**

PLEASE TAKE NOTICE that, on June 15, 2020 (the “Petition Date”), the above-captioned debtor and debtor in possession (collectively, the “Debtor”), filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware.

PLEASE TAKE NOTICE that, the following motions (collectively, the “First Day Motions”) were approved on an interim basis [Docket Nos. 40, 41, 42, 44 & 45] and will be heard on a final basis at a hearing scheduled for **July 14, 2020 at 11:30 a.m. (ET)** (the “Second Day Hearing”) before the Honorable Brendan Linehan Shannon, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6th Floor, Courtroom 1, Wilmington, Delaware 19801 (the “Court”):

1. **Wages Motion.** Debtor’s Motion for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a), 363, 507(a), 541, 1107(a) and 1108, and Fed. R. Bankr. P. 6003 and 6004, to *Inter Alia*, (I) Authorize, But Not Direct, the Debtor to Pay Prepetition Wages, Compensation and Employee Benefits; (II) Authorize, But Not Direct, the Debtor to Continue Certain Employee Benefit Programs in the Ordinary Course; (III) Authorize All Banks to Honor Prepetition Checks for Payment of Prepetition Employee Obligations; and (IV) Grant Other Related Relief [Docket No. 3]

¹ The last four digits of the Debtor’s taxpayer identification number are 2680. The Debtor’s corporate headquarters is located at 2600 Bridge Parkway, Redwood City, California 94065



2. **Utilities Motion.** Debtor's Motion for Interim and Final Orders Pursuant to 11 U.S.C. §§ 105(a) and 366 (I) Approving Debtor's Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections by Utility Companies, and (III) Prohibiting Utility Companies from Alerting, Refusing or Discontinuing Service [Docket No. 4]
3. **Insurance Motion.** Debtor's Motion for Interim and Final Orders Authorizing Debtor to (I) Maintain Existing Insurance Policies and Pay All Obligations Arising Thereunder; and (II) Renew, Revise, Extend, Supplement or Enter into New Insurance Policies Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 1107 and 1108, and Fed. R. Bankr. P. 6003 and 6004 [Docket No. 5]
4. **Cash Management Motion.** Debtor's Motion for Interim and Final Orders (A) Authorizing the Debtor to (I) Continue to Operate Its Cash Management System, (II) Honor Certain Prepetition Obligations Related Thereto and (III) Maintain Existing Business Forms; (B) Authorizing the Debtor's Banks to Honor All Related Payment Requests and (C) Granting Related Relief [Docket No. 7]
5. **Cash Collateral Motion.** Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Debtor to Use Cash Collateral, (II) Granting Adequate Protection to Secured Lender, (III) Scheduling Final Hearing, and (IV) Granting Related Relief [Docket No. 8]

PLEASE TAKE FURTHER NOTICE that objections, if any to the First Day Motions must comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of Delaware. Objections, if any, to the First Day Motions must be filed with the Court and served upon each of the parties set forth below **on or before July 7, 2020 at 4:00 p.m. (ET)**: (i) proposed counsel to the Debtor, (a) Goodwin Procter LLP, 620 Eighth Ave., New York, NY 10018 (Attn: Nathan A. Schultz (nschultz@goodwinlaw.com), Barry Z. Bazian (bbazian@goodwinlaw.com)) and (b) Potter Anderson & Corroon LLP, 1313 North Market Street, 6th Floor, Wilmington, Delaware 19801 (Attn: L. Katherine Good (kgood@potteranderson.com)); (ii) Office of the United States Trustee, J. Caleb Boggs Federal Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Benjamin A. Hackman

(Benjamin.A.Hackman@usdoj.gov)); and (iii) if any statutory committee has been appointed in the Chapter 11 Case, counsel to such committee.

PLEASE TAKE FURTHER NOTICE that copies of the First Day Motions and the interim orders entered with respect to the First Day Motions, which are served herewith, can be obtained through the Court's website at <https://ecf.deb.uscourts.gov>, referencing Case No. 20-11580 (BLS), and on the website of the Debtor's notice and claims agent, Kurtzman Carson Consultants LLC, at www.kccllc.net/proteus.

PLEASE TAKE FURTHER NOTICE that the Second Day Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Second Day Hearing or at a later hearing. The Debtor will file an agenda before the Second Day Hearing, which may modify or supplement the motions and applications to be heard at the Second Day Hearing.

PLEASE TAKE FURTHER NOTICE that you need not appear at the hearing if you do not object to the relief requested in the First Day Motions.

PLEASE TAKE FURTHER NOTICE THAT IF YOU DO NOT WANT THE COURT TO GRANT THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS, OR IF YOU WANT THE COURT TO CONSIDER YOUR VIEW ON THE FIRST DAY MOTIONS, THEN YOU OR YOUR ATTORNEY MUST TIMELY FILE AND SERVE AN OBJECTION AND ATTEND THE SECOND DAY HEARING. IF YOU OR YOUR ATTORNEY DO NOT TAKE THESE STEPS, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE FIRST DAY MOTIONS AND MAY ENTER ORDERS GRANTING THE RELIEF REQUESTED IN THE FIRST DAY MOTIONS.

Dated: June 19, 2020
Wilmington, Delaware

POTTER ANDERSON & CORROON LLP

/s/ Aaron H. Stulman

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Proposed Counsel for Debtor and Debtor in Possession