

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

OAKLAND PHYSICIANS MEDICAL
CENTER, L.L.C. d/b/a DOCTORS'
HOSPITAL OF MICHIGAN, a Michigan
limited liability company,

Case No. 15-51011-wsd
Chapter 11

Debtor.

**ORDER ESTABLISHING PROCEDURES FOR SOLICITATION
AND TABULATION OF VOTES TO ACCEPT OR REJECT
COMPETING PLANS AND GRANTING RELATED RELIEF**

This matter has come before the Court upon the motion [DE 190] (the “**Motion**”) of Sant Partners, LLC for entry of an order, pursuant to sections 1125 and 1126 of title 11 of the United States Code (the “**Bankruptcy Code**”), rules 2002, 3016, 3017, 3018 and 3020 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rule 3018-1 of the Local Rules for the United States Bankruptcy Court for the Eastern District of Michigan (the “**Local Rules**”), (i) establishing procedures for solicitation and tabulation of votes to accept or reject *Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center Proposed by Sant Partners, LLC* and (ii) granting related relief; whereas Sant Partners, LLC filed its Second Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center Proposed by Sant Partners, LLC [DE 268] (the “**Sant Plan**”); whereas a competing plan of reorganization and disclosure statement was filed by Save the Hospital Group [DE 266] (including all exhibits thereto and as amended, modified or supplemented from time to time, the “**Save the Hospital Plan**”; whereas a competing plan of reorganization was filed by Allied Global Consulting [DE 272] (the “**Allied Plan**” and, collectively with the Sant Plan and the Save The Hospital Group Plan, the “**Plans**,” and each a

“**Plan**”); and whereas the Court has entered its *Order Establishing Deadlines and Procedures for Competing Combined Disclosure Statements and Plans of Reorganization* (“**Initial Procedures Order**”) [DE 126];

IT IS HEREBY ORDERED THAT:

1. Pursuant to Local Rule 3018-1 UpShot Services LLC is authorized to serve as voting and balloting agent (“**Voting Agent**”). The fees and expenses of the Voting Agent shall be shared equally by each Plan proponent and within two days after entry of this Order each Plan proponent shall pay \$2,000.00 as a retainer to the Voting Agent to cover such expenses.

2. The Voting Agent shall mail or caused to be mailed to holders of Claims in Classes 3, 4, 5, 6 and 7 of the Plans, by no later than **November 21, 2015** (the “**Solicitation Deadline**”), a solicitation package containing: (a) written notice of the confirmation hearing (the “**Confirmation Hearing Notice**”), substantially in the form attached hereto as **Exhibit A**; (b) each combined plan and disclosure statement that has been primarily approved by this Court (either by paper copy or in “pdf” format on a CD-ROM); (c) a ballot (substantially in the form attached hereto as **Exhibit B**) and ballot return envelope; and (d) a solicitation letter from each of the Plan proponents (collectively, the “**Solicitation Package**”). The Solicitation Package may also include a letter from the Official Committee of Unsecured Creditors indicating its support or preferences with respect to the proposed plans, which may be separately served after November 21, 2015. The Solicitation Package and the manner of service of the Solicitation Package satisfies the requirements of Bankruptcy Rule 3017(d) and applicable law.

3. The proponent of each Plan shall mail or cause to be mailed to each of the known counterparties to executory contracts and unexpired leases that are expressly assumed or rejected under the respective Plans notice that such contract or lease will be assumed or rejected under the

plan and a copy of the Plan proponent's combined Plan and disclosure statement (either by paper copy or in "pdf" format on a CD-ROM, at the Plan proponent's discretion).

4. Pursuant to Bankruptcy Rule 3017(d), the Voting Agent is not required to transmit a Solicitation Package to the parties not entitled to vote on either Plan (each, a "**Non-Voting Party**"). By the Solicitation Deadline, the Voting Agent shall mail or cause to be mailed to each Non-Voting Party the Non-Voting Creditor Notice, substantially in the form attached hereto as **Exhibit C**.

5. The Chapter 11 Trustee shall cause notice (the "**Publication Notice**"), substantially in the form attached to the hereto as **Exhibit D**, to be published in each of the (i) the Detroit Free Press; and (ii) The Oakland Press within ten days after the entry of this Order. The fees and expenses of the publication of the Publication Notice shall be shared equally by each Plan proponent and each Plan proponent shall pay \$500.00 as a retainer to the Chapter 11 Trustee to cover such expenses within two days after entry of this Order.

6. Subject to the Initial Procedures Order, November 12, 2015 is established as the record date (the "**Record Date**") for the purposes of determining the creditors and interest holders entitled to receive the Solicitation Package or the Non-Voting Creditor Notice and to vote on each Plan.

7. The Voting Agent is not required to send Solicitation Packages or Non-Voting Creditor Notices to addresses and entities to which the notice of the Disclosure Statement Hearing was returned by the United States Postal Service as undeliverable, unless the Voting Agent is provided with an accurate address. Neither the Voting Agent nor any Plan proponent shall have an obligation to identify an alternative address.

8. The Ballot, substantially in the form attached hereto as **Exhibit B**, is hereby approved.

9. In addition to accepting Ballots via first class mail, overnight courier and hand delivery, the Voting Agent is authorized to accept Ballots electronically, so as to actually be received on or before the Voting Deadline, through a customized “E-Ballot” section on a web site established by the Voting Agent at the url listed on the Ballot. Parties entitled to vote may cast an electronic ballot and electronically sign and submit the Ballot instantly by using Voting Agent’s E-Ballot platform. Instructions for electronic submission of Ballots are set forth on the form of Ballot. The encrypted ballot data and audit trail created by such electronic submission shall become part of any Ballot submitted in this Chapter 11 Case and the electronic signatures submitted by the holders of Claims will be deemed to be immediately legally valid and effective. Except as otherwise set forth in this Order, Ballots cast by facsimile, email or other electronic transmission will not be counted unless approved in advance by the Voting Agent in writing.

10. For purposes of voting on each Plan, the amount of a claim held by a creditor shall be determined pursuant to the following guidelines:

- a. Except as set forth in the Initial Procedures Order, the claim amount listed in the Debtor’s schedule of liabilities, provided that (i) such claim is not scheduled as contingent, unliquidated or disputed, and (ii) no proof of claim has been timely filed (or otherwise deemed timely filed by the Court under applicable law).
- b. Except as set forth in the Initial Procedures Order, the noncontingent and liquidated amount specified in a timely filed proof of claim on or before **November 12, 2015** (the “**Claim Voting Bar Date**”) to the extent the proof of claim is not the subject of (i) an objection as to its allowance or (ii) or an objection to a claim amount solely for voting purposes. For avoidance of doubt, the Claim Voting Bar Date is for purposes of voting on the Plan only and does not modify the substantive deadline to file a proof of claim of November 27, 2015, established by this Court for purposes of determining the allowed amount of any claim.

- c. The amount temporarily allowed by the Court for voting purposes pursuant to Bankruptcy Rule 3018(a), pursuant to a motion (a “**Claims Estimation Motion**”).
- d. Claims filed for zero dollars (\$0.00) will be disallowed for voting purposes, other than as set forth in subparagraph (f) of this Paragraph 10.
- e. The amount resolved pursuant to a stipulation with the Chapter 11 Trustee or order entered by the Court.
- f. Claims that are filed in wholly contingent, unliquidated or unknown amounts that are not the subject of an objection filed by the Claims Objection Deadline be temporarily allowed for voting purposes only, and not for purposes of allowance or distribution, in the amount of \$1.00 each.

11. Creditors seeking to have a claim temporarily allowed for purposes of voting to accept or reject the Plans pursuant to Bankruptcy Rule 3018(a) must file and serve the Claims Estimation Motion for such relief no later than **4:30 p.m. (Eastern Time) on December 1, 2015**.

The Court will schedule a hearing on such motion to be heard at or prior to the Confirmation Hearing.

12. The following voting procedures and standard assumptions shall be used in tabulating the Ballots:

- a. For purposes of the numerosity requirement of section 1126(c) of the Bankruptcy Code, separate claims held by a single creditor in a particular class will be aggregated as if such creditor held one claim against the Debtor in such class, and the votes related to such claims will be treated as a single vote to accept or reject a Plan.
- b. Creditors must vote all of their claims within a particular class either to accept or reject a Plan and may not split their vote. Accordingly, a ballot (or multiple ballots with respect to multiple claims within a single class) that partially rejects and partially accepts the Plan will not be counted.
- c. Ballots that fail to indicate an acceptance or rejection of a Plan or that indicate both acceptance and rejection of a Plan, but which are otherwise properly executed and received prior to the Voting Deadline, will not be counted with respect to such Plan.
- d. A creditor is permitted to cast a ballot to accept or reject one Plan and abstain from voting to accept or reject any other Plan.

- e. The ballot shall provide creditors with the opportunity to select which Plan such creditor prefers. If a creditor selects more than one Plan as its preference, such preference shall not be counted.
- f. Only signed ballots that are timely received will be counted. Unsigned ballots will not be counted.
- g. Any ballot received after the Voting Deadline will not be counted.
- h. Ballots that are illegible, or contain insufficient information to permit the identification of the creditor, will not be counted.
- i. Whenever a creditor casts more than one ballot voting the same claim prior to the Voting Deadline, the last executed, properly completed ballot received prior to the Voting Deadline shall be deemed to reflect the voter's intent and supersede any prior ballots.
- j. If a creditor simultaneously casts inconsistent duplicate ballots, with respect to the same claim, such ballots shall not be counted.
- k. Each creditor shall be deemed to have voted the full amount of its claim. Questions as to the validity, form, eligibility (including time of receipt), acceptance, and revocation or withdrawal of ballots shall be documented in voting results filed with this Court and determined by the Court.
- l. Notwithstanding anything to the contrary contained herein, any claimant/creditor who has filed a claim that is duplicative of another claim(s) within the same Class, shall be provided with only one Solicitation Package and one ballot for voting a single claim in such class, regardless of whether the Chapter 11 Trustee has objected to such duplicate claim(s).
- m. All invalid ballots shall be documented in the voting results filed with this Court.

13. By **1:00 p.m. (Eastern Time) on November 18, 2015**, each plan proponent is required to submit to the Voting Agent an electronic copy of its combined plan and disclosure statement, including any exhibits thereto that are to be contained in the Solicitation Package.

14. Prior to mailing the Disclosure Statement, Solicitation Packages, or the Non-Voting Creditor Notices, each Plan proponent may fill in any missing dates and other information, correct any typographical errors and make such other non-material, non-substantive changes to its respective Plan as it deems appropriate.

15. The confirmation hearing will be an evidentiary hearing. Any party in interest that intends to offer testimony, in the form of live testimony or a declaration, in support of, or to oppose, confirmation of a Plan shall file a designation of potential witnesses and the topics of testimony of such witnesses on or before **December 3, 2015**. Potential witnesses shall be made available for deposition prior to **December 11, 2015**. The parties shall meet and confer to develop a deposition schedule on **December 4, 2015**.

16. Except as set forth in the following sentence, a declaration shall not be admitted into evidence, unless the declarant is made available for cross-examination at the confirmation hearing. If it is unopposed, the declaration of the Voting Agent setting forth a summary of the voting results ("Voting Declaration") may be admitted into evidence at the confirmation hearing without the need for the declarant to be made available for cross examination. Any objection to the admission of the Voting Declaration must be made by **4:30 p.m. (Eastern Time) on December 13, 2015**.

17. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

OAKLAND PHYSICIANS MEDICAL
CENTER, L.L.C. d/b/a DOCTORS'
HOSPITAL OF MICHIGAN, a Michigan
Limited Liability Company,

Case No. 15-51011-ws
Chapter 11

Debtor.

Hon. Walter Shapero

NOTICE OF CONFIRMATION HEARING

TO: ALL HOLDERS OF CLAIMS IN THE ABOVE-CAPTIONED CHAPTER 11 CASE

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. **Preliminary Approval of the Sant Disclosure Statement.** On November 17, 2015, Sant Partners, LLC (“**Sant**”), a plan proponent and a creditor and party-in-interest in the above-captioned chapter 11 case of Oakland Physicians Medical Center, L.L.C. d/b/a Doctors’ Hospital of Michigan (the “**Debtor**”) filed its Second Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center Proposed by Sant Partners, LLC [DE 268] (as may be amended from time to time, the “**Sant Plan**” and the “**Sant Disclosure Statement**”).¹ The Bankruptcy Court for the Eastern District of Michigan (the “**Bankruptcy Court**”) has preliminarily approved the Sant Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

2. **Preliminary Approval of the Save the Hospital Disclosure Statement.** On November 17, 2015, Save the Hospital Group (“**Save the Hospital**”), a plan proponent and a creditor and party-in-interest in the Debtor’s chapter 11 case filed its Second Amended Combined Plan of Reorganization and Disclosure Statement [DE 266] (as may be amended from time to time, the “**Save the Hospital Plan**” and the “**Save the Hospital Disclosure Statement**”). The Bankruptcy Court has preliminarily approved the Save the Hospital Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

3. **Preliminary Approval of the Allied Global Consulting Disclosure Statement.** On November 13, 2015, Allied Global Consulting (“**Allied**”), a plan proponent and a creditor and party-in-interest in the Debtor’s chapter 11 case filed its First Amended Combined

¹ Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Sant Plan.

Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center L.L.C. Proposed by Allied Global Consulting [DE 272] (as may be amended from time to time, the “**Allied Plan**” and the “**Allied Disclosure Statement**,” and, collectively, with the Sant Plan, Save the Hospital Plan, Sant Disclosure Statement, and Save the Hospital Disclosure Statement the “**Plans**” and the “**Disclosure Statements**”). The Bankruptcy Court has preliminarily approved the Allied Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

4. **Voting Deadline.** The deadline for voting on the Plans is **4:30 p.m., prevailing Eastern Time, on December 11, 2015** (the “**Voting Deadline**”). If you received a Solicitation Package, including a Ballot, and intend to vote on the Plans, in order for your vote to be counted you must: (a) follow the instructions carefully and (b) complete all the required information on the Ballot so that it is **actually received** by UpShot Services, LLC (the “**Voting Agent**”) according to and as set for in detail in the voting instructions on or before the Voting Deadline. A failure to follow such instructions may disqualify your vote.

5. **The Confirmation Hearing Date.** The hearing (“**Confirmation Hearing**”) on the final approval of the Disclosure Statements will be consolidated with the hearing on the confirmation of the Plans, which hearing has been set for **December 17, 2015 at 11:30 a.m. (Eastern Time)** at the U.S. Bankruptcy Court for the Eastern District of Michigan located at Courtroom 1042, 231 West Lafayette Street, Detroit, MI 48226. The Confirmation Hearing may be adjourned from time to time without further notice except for an announcement of the adjourned date made at the hearing.

6. **Confirmation Objection Deadline.** The deadline for filing objections to confirmation of either of the Plans is **December 11, 2015 at 4:30 p.m. (Eastern Time)** (the “**Confirmation Objection Deadline**”).

7. **Objections to the Plans.** All objections, if any, to a Plan must: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Bankruptcy Rules, and any orders of the Bankruptcy Court; (c) state the name and address of the objecting party; (d) state with particularity the basis and nature of any objection to the Plan and may propose language to remedy such objection; and (e) be filed with the Bankruptcy Court and served so that it is **actually received** on or prior to the Confirmation Objection Deadline by the following parties:

- a. To Sant Partners, LLC: Honigman Miller Schwartz and Cohn LLP, 2290 First National Building, 660 Woodward Avenue, Detroit, MI 48226; Attn: E. Todd Sable and Glenn Walter;
- b. To Save the Hospital Group: Sheldon S. Toll, PLLC, 29580 Northwestern Hwy., Suite 100, Southfield, MI 48034; Attn: Sheldon S. Toll;
- c. To Allied: Kenneth R. Beams, PLLC, 2145 Crooks, Suite 220, Troy, MI 48226; Attn: Kenneth R. Beams;
- d. To the Chapter 11 Trustee: Simon, Stella & Zingas, P.C., 645 Griswold, Suite 3466, Detroit, MI 48226; Attn: Stephen P. Stella;

- e. To the Creditors' Committee: Simon PLC, 363 W. Big Beaver Rd., Suite 250, Troy, MI 48084; Attn: Craig T. Mierzwa and Gary Hansz; and
- f. The Office of the United States Trustee, 211 W. Fort Street, Suite 700, Detroit, MI 48226; Attn: Leslie K. Berg.

8. **Differences in the Plans.** The Competing Plans propose different equity investments to acquire ownership in the reorganized Debtor. You are encouraged to read the Disclosure Statements in their entirety to make an assessment of the feasibility of the proposed Plans. The below summarizes the treatment of claims and interests under the competing Plans:

| Class of Claims | Sant Plan | Save the Hospital Plan | Allied Global Consulting Plan |
|---------------------------------------|--|---|--|
| Class 1 – Non-Tax Priority Claims | Cash equal to the unpaid portion of such Allowed Non-Tax Priority Claim. | Cash equal to the unpaid portion of such Allowed Non-Tax Priority Claim. | Cash equal to the unpaid portion of such Allowed Non-Tax Priority Claim. |
| Class 2 - Other Secured Claims | Such Claims will either: (i) be Reinstated; (ii) be paid in Cash, in full; (iii) be satisfied by the surrender to the Holder of the Claim of the collateral securing the applicable Other Secured Claim; or (iv) be satisfied in accordance with such other terms and conditions as may be agreed upon by the Reorganized Debtor and the Holder of such Allowed Secured Claim. | Such Claims will either: (i) be Reinstated; (ii) be paid in Cash, in full; (iii) be satisfied by the surrender to the Holder of the Claim of the collateral securing the applicable Other Secured Claim; or (iv) be satisfied in accordance with such other terms and conditions as may be agreed upon by the Reorganized Debtor and the Holder of such Allowed Secured Claim. | Such Claims will either: (i) be Reinstated; (ii) be paid in Cash, in full; (iii) be satisfied by the surrender to the Holder of the Claim of the collateral securing the applicable Other Secured Claim; or (iv) be satisfied in accordance with such other terms and conditions as may be agreed upon by the Reorganized Debtor and the Holder of such Allowed Secured Claim. |
| Class 3 - Crittenton Secured Claims | The right to receive a new note in the original principal amount of \$500,000. In addition, the Reorganized Debtor will assume, as amended, the graduate medical affiliation agreement between the Debtor and Crittenton and enter into a new affiliation agreement for the 2016-2018 academic years. | The Crittenton Secured Claim shall be Reinstated, and paid in full in equal monthly installments over ten (10) years with interest at three percent (3%) per annum; provided that it is a condition precedent to the Effective Date that the Proponent/Debtor and Crittenton have agreed, in form and substance agreeable to Proponent, whether that certain Graduate Medical Education Affiliation Agreement between Crittenton and the Debtor dated April 14, 2011 will be assumed and whether any new Medicare graduate medical education affiliation agreements will be proposed. | A payment of \$1 million on the Effective Date. In addition, the Reorganized Debtor will assume, as amended, the graduate medical affiliation agreement between the Debtor and Crittenton, with no cure amount payable and a waiver by Crittenton of any pre-Effective Date defaults, and enter into a new affiliation agreement for the 2016-2018 academic years |
| Class 4 - CMS Overpayment Claims | Reinstated and the participation agreements between the Debtor and CMS will be deemed assumed. | Reinstated and the participation agreements between the Debtor and CMS will be deemed assumed. | Reinstated and the participation agreements between the Debtor and CMS will be deemed assumed. |
| Class 5 - Michigan Overpayment Claims | Reinstated and the participation agreements between the Debtor and Michigan will be assumed. | Reinstated and the participation agreements between the Debtor and Michigan will be assumed. | Reinstated and the participation agreements between the Debtor and Michigan will be assumed. |

| Class of Claims | Sant Plan | Save the Hospital Plan | Allied Global Consulting Plan |
|------------------------------------|---|---|---|
| Class 6 - WRC Secured Claims | Sixty (60) equal monthly payments of \$13,237.76 over a five year period commencing on the first day of the month following the Effective Date with no interest accruing for the period after the Petition Date. | Sixty (60) equal monthly payments of \$13,237.76 over a five year period commencing on the first day of the month following the Effective Date with no interest accruing for the period after the Petition Date. | Sixty (60) equal monthly payments of \$13,237.76 over a five year period commencing on the first day of the month following the Effective Date with no interest accruing for the period after the Petition Date. |
| Class 7 - General Unsecured Claims | A <i>pro rata</i> share of Trust Beneficial Interests, which includes the right to pursue identified causes of action plus the Trust Guaranteed Cash Payment to the Trust in the amount of up to \$1,600,000 to be paid over a five (5) year period without interest. | A payment of 10% of the amount of the Claim paid over five (5) years without interest. Based upon estimated Class 7 claims of \$13,000,000, this would represent payment to Class 7 of \$1,300,000 over a five (5) year period. The difference between this unsecured claim estimate and the Sant estimate is the treatment by the Save the Hospital Group of the Crittenton Hospital claim as fully secured. | A <i>pro rata</i> share of Trust Beneficial Interests, which includes the right to receive proceeds in a liquidating trust that will be funded with \$150,000 in cash and have the ability to pursue certain identified causes of action. |
| Class 8 - Old Equity Interests | Cancelled | Cancelled | Cancelled |

9. **Obtaining Solicitation Materials.** If you received Solicitation Package materials in CD-ROM format and desire paper copies, or if you need to obtain additional Solicitation Packages, you may: (a) contact the Voting Agent at: Oakland Physicians Medical Center, L.L.C. Ballot Processing, c/o UpShot Services LLC, 7808 Cherry Creek South Drive, Suite 112, Denver, CO 80213 or via telephone at (855) 812-6112; or (b) download such documents (for a fee) by visiting the Bankruptcy Court's website at <http://www.mieb.uscourts.gov>.

10. **Filing the Plan Supplements.** Each Plan proponent will file a notice to be received by all parties requesting ECF notifications of filings in this chapter 11 case that will: (i) inform parties that the Plan proponent filed the respective Plan Supplement; and (ii) list the information contained in the Plan Supplement. Parties may obtain copies of the respective Plan Supplements by contacting counsel for the applicable Plan proponent at the addresses below.

BINDING NATURE OF THE PLANS

THE CONFIRMED PLAN SHALL BIND ALL HOLDERS OF CLAIMS AND EQUITY INTERESTS TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, WHETHER OR NOT SUCH HOLDER WILL RECEIVE OR RETAIN ANY PROPERTY OR INTEREST IN PROPERTY UNDER SUCH PLAN, HAS FILED A PROOF OF CLAIM IN THE DEBTOR'S BANKRUPTCY CASE, OR FAILED TO VOTE TO ACCEPT OR REJECT THE CONFIRMED PLAN, OR VOTED TO REJECT THE CONFIRMED PLAN.

Date: [____], 2015

HONIGMAN MILLER SCHWARTZ AND COHN LLP
Counsel for Sant Partners, LLC

By: /s/
E. Todd Sable (P54956)
Glenn S. Walter (P79853)
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226
Telephone: (313) 465-2876
Facsimile: (313) 465-8000
Email: tsable@honigman.com

-and-

SHELDON S. TOLL PLLC
Counsel for Save the Hospital Group

By: /s/
Sheldon S. Toll (P21490)
29580 Northwestern Hwy.
Suite 100
Southfield, MI 48034
Telephone: (248) 797-9111
Email: sst@lawtoll.com

-and-

KENNETH R. BEAMS, PLLC

Counsel for Allied Global Consulting

By: /s/
Kenneth R. Beams (P63248)
2145 Crooks
Suite 200
Troy, MI 48084
Telephone: (248) 396-3987
Email: kennethbeams@gmail.com

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

OAKLAND PHYSICIANS MEDICAL
CENTER, L.L.C. d/b/a DOCTORS'
HOSPITAL OF MICHIGAN, a Michigan
limited liability company,

Case No. 15-51011-ws
Chapter 11

Debtor.

Hon. Walter Shapero

**CLASS [3] BALLOT FOR ACCEPTING AND REJECTING THE SECOND AMENDED
COMBINED DISCLOSURE STATEMENT AND PLAN OF REORGANIZATION OF
OAKLAND PHYSICIANS MEDICAL CENTER, L.L.C. PROPOSED BY SANT
PARTNERS, LLC, THE SECOND AMENDED COMBINED PLAN OF
REORGANIZATION AND DISCLOSURE STATEMENT PROPOSED BY SAVE THE
HOSPITAL GROUP, AND THE FIRST AMENDED COMBINED DISCLOSURE
STATEMENT AND PLAN OF REORGANIZATION OF OAKLAND PHYSICIANS
MEDICAL CENTER, L.L.C. PROPOSED BY ALLIED GLOBAL CONSULTING**

This Ballot is for holders of [Class 3 Crittenton Secured Claims] against the above-captioned Debtor to vote on each of: (1) the Second Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center Proposed by Sant Partners, LLC [DE 268] (as may be amended from time to time, the “**Sant Plan**” and the “**Sant Disclosure Statement**”); (2) the Second Amended Combined Plan of Reorganization and Disclosure Statement [DE 266] proposed by the Save the Hospital Group (as may be amended from time to time, the “**Save the Hospital Plan**” and the “**Save the Hospital Disclosure Statement**”); and (3) the First Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center L.L.C. Proposed by Allied Global Consulting [DE 272] (as may be amended from time to time, the “**Allied Plan**” and the “**Allied Disclosure Statement**,” and, collectively, with the Sant Plan, the Sant Disclosure Statement, the Save the Hospital Plan, and the Save the Hospital Disclosure Statement, the “**Competing Plans**”). Each of the Competing Plans classifies [Crittenton Secured Claims] in [Class 3]. If you hold another Claim in another class that is entitled to vote, you will receive a separate ballot.

The Sant Plan, the Save the Hospital Plan, or the Allied Plan will be made binding upon you if it is confirmed by the Bankruptcy Court. The Bankruptcy Court, however, can only confirm one of the Competing Plans. If more than one of the Competing Plans satisfies the confirmation requirements set forth in Section 1129 of the Bankruptcy Code, the Bankruptcy Court shall consider the preferences of creditors and equity security holders in determining which of the Competing Plans to confirm.

To ensure that your vote is counted, you must: (a) complete the ballot; (b) indicate your decision to either accept or reject each of the Competing Plans in the boxes provided in item 2 of the ballot and indicate which of the Competing Plans you prefer; (c) submit the ballot (i) to the address set forth on the enclosed pre-addressed envelope or (ii) electronically at the Debtor's case website, www.upshotservices.com/opmc.

Item 1. Amount and Type of Claim.¹

Item 2. Vote on Plan.

The holder of the Claim against the Debtor set forth in Item 1 votes to (please check one for EACH plan):

| Sant Plan | Save the Hospital Plan | Allied Plan |
|--|---|--|
| <input type="checkbox"/> Accept (vote FOR) the Sant Plan | <input type="checkbox"/> Accept (vote FOR) the Save the Hospital Plan | <input type="checkbox"/> Accept (vote FOR) the Allied Plan |
| <input type="checkbox"/> Reject (vote AGAINST) the Sant Plan | <input type="checkbox"/> Reject (vote AGAINST) the Save the Hospital Plan | <input type="checkbox"/> Reject (vote AGAINST) the Allied Plan |
| Vote Preference (Select One Only) | | |
| <input type="checkbox"/> Prefer the Sant Plan | <input type="checkbox"/> Prefer the Save the Hospital Plan | <input type="checkbox"/> Prefer the Allied Plan |

Item 3. IMPORTANT INFORMATION REGARDING THE RELEASES IN THE PLANS:

Each of the Competing Plans contains detailed release, exculpation and discharge provisions. You should review these sections carefully before you vote.

Item 4. Required Information.

By signing this ballot, I certify that:

- (a) the undersigned is a holder of the Claim being voted in the amount indicated in Item 1, or is an authorized signatory of the holder of the Claim being voted in the amount indicated in Item 1;
- (b) the undersigned has received a copy of the Sant Disclosure Statement, the Save the Hospital Disclosure Statement, and the Allied Disclosure Statement and acknowledges that the solicitation is being made pursuant to the terms and conditions set forth therein; and
- (c) no other ballots with respect to the Claims identified in Item 1 have been cast or, if any other ballots have been cast with respect to such Claims, then any usch earlier ballots are hereby revoked.

Date: _____

Name: _____ (print or type)

Signature: _____

Title: _____

Phone number: _____ (optional)

E-mail address: _____ (optional)

Item 5. Return Ballot. Your ballot must be received by: UpShot Services LLC by **4:30 p.m. prevailing Eastern Time on December 11, 2015.** The Ballot must be completed and submitted, on or before the Voting Deadline, by **only one** of the following approved submission methods:

| First Class Mail, Overnight Courier, or Hand-Delivery To: | Electronic, Online Submission at: |
|---|--|
| Oakland Physicians Medical Center, L.L.C. Ballot Processing, c/o Upshot Services LLC 7808 Cherry Creek South Drive, Suite 112 Denver, CO 80231 | www.upshotservices.com/opmc. Click on the “E-Ballot” section of the Debtor’s website and follow the directions to complete and submit your Ballot. You should not also return a hard copy of your Ballot if submitting electronically. |

¹ If you have claims in different Classes, you must submit separate ballots for each Class.

EXCEPT AS EXPRESSLY PERMITTED ABOVE WITH RESPECT TO E-BALLOTS, BALLOTS OTHERWISE SUBMITTED BY FACSIMILE, TELECOPY, ELECTRONIC MAIL, OR OTHER FORM OF ELECTRONIC SUBMISSION WILL NOT BE ACCEPTED.

If your Ballot is damaged or lost, or if you have any questions concerning voting procedures, please call UpShot Services LLC at (855) 812-6112.

YOU SHOULD COMPLETE AND SIGN THE ENCLOSED BALLOT AND RETURN IT AS DESCRIBED ABOVE. IN ORDER TO BE COUNTED, BALLOTS MUST BE DULY COMPLETED AND EXECUTED AND RECEIVED NO LATER THAN 4:30 P.M. PREVAILING EASTERN TIME ON THE BALLOT DATE DEADLINE OF DECEMBER 11, 2015, UNLESS SUCH DEADLINE IS EXTENDED BY COURT ORDER.

EXHIBIT C

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

OAKLAND PHYSICIANS MEDICAL
CENTER, L.L.C. d/b/a DOCTORS'
HOSPITAL OF MICHIGAN, a Michigan
limited liability company,

Case No. 15-51011-ws
Chapter 11

Debtor.

Hon. Walter Shapero

NOTICE TO NON-VOTING CREDITORS

**TO: ALL HOLDERS OF CLAIMS IN THE ABOVE-CAPTIONED CHAPTER 11 CASES
THAT ARE NOT ENTITLED TO VOTE ON THE PLANS**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. **Preliminary Approval of the Sant Disclosure Statement.** On November 17, 2015, Sant Partners, LLC (“**Sant**”), a plan proponent and a creditor and party-in-interest in the above-captioned chapter 11 case of Oakland Physicians Medical Center, L.L.C. d/b/a Doctors’ Hospital of Michigan (the “**Debtor**”) filed its Second Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center Proposed by Sant Partners, LLC [DE 268] (as may be amended from time to time, the “**Sant Plan**” and the “**Sant Disclosure Statement**”).¹ The Bankruptcy Court for the Eastern District of Michigan (the “**Bankruptcy Court**”) has preliminarily approved the Sant Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

2. **Preliminary Approval of the Save the Hospital Disclosure Statement.** On November 17, 2015, Save the Hospital Group (“**Save the Hospital**”), a plan proponent and a creditor and party-in-interest in the Debtor’s chapter 11 case filed its Second Amended Combined Plan of Reorganization and Disclosure Statement [DE 266] (as may be amended from time to time, the “**Save the Hospital Plan**” and the “**Save the Hospital Disclosure Statement**”). The Bankruptcy Court has preliminarily approved the Save the Hospital Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

3. **Preliminary Approval of the Allied Global Consulting Disclosure Statement.** On November 17, 2015, Allied Global Consulting (“**Allied**”), a plan proponent and a creditor

¹ Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Sant Plan.

and party-in-interest in the Debtor's chapter 11 case filed its First Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center L.L.C. Proposed by Allied Global Consulting [DE 272] (as may be amended from time to time, the "**Allied Plan**" and the "**Allied Disclosure Statement**," and, collectively, with the Sant Plan, Save the Hospital Plan, Sant Disclosure Statement, and Save the Hospital Disclosure Statement the "**Plans**" and the "**Disclosure Statements**"). The Bankruptcy Court has preliminarily approved the Allied Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

4. **Non-Voting Classes.** Holders of Old Equity Interests (Class 8) are deemed to have rejected the Plans and are, therefore, not entitled to vote. Holders of Non-Tax Priority Claims (Class 1) and Other Secured Claims (Class 2) are not impaired and thus will not be entitled to vote to accept or reject the Plans.

5. **Treatment of Claims and Interests Under the Plans.** Under the Plans, the eight Classes of Claims and Equity Interests will receive the following treatment:

| Class of Claims | Sant Plan | Save the Hospital Plan | Allied Global Consulting Plan |
|-------------------------------------|--|---|--|
| Class 1 – Non-Tax Priority Claims | Cash equal to the unpaid portion of such Allowed Non-Tax Priority Claim. | Cash equal to the unpaid portion of such Allowed Non-Tax Priority Claim. | Cash equal to the unpaid portion of such Allowed Non-Tax Priority Claim. |
| Class 2 - Other Secured Claims | Such Claims will either: (i) be Reinstated; (ii) be paid in Cash, in full; (iii) be satisfied by the surrender to the Holder of the Claim of the collateral securing the applicable Other Secured Claim; or (iv) be satisfied in accordance with such other terms and conditions as may be agreed upon by the Reorganized Debtor and the Holder of such Allowed Secured Claim. | Such Claims will either: (i) be Reinstated; (ii) be paid in Cash, in full; (iii) be satisfied by the surrender to the Holder of the Claim of the collateral securing the applicable Other Secured Claim; or (iv) be satisfied in accordance with such other terms and conditions as may be agreed upon by the Reorganized Debtor and the Holder of such Allowed Secured Claim. | Such Claims will either: (i) be Reinstated; (ii) be paid in Cash, in full; (iii) be satisfied by the surrender to the Holder of the Claim of the collateral securing the applicable Other Secured Claim; or (iv) be satisfied in accordance with such other terms and conditions as may be agreed upon by the Reorganized Debtor and the Holder of such Allowed Secured Claim. |
| Class 3 - Crittenton Secured Claims | The right to receive a new note in the original principal amount of \$500,000. In addition, the Reorganized Debtor will assume, as amended, the graduate medical affiliation agreement between the Debtor and Crittenton and enter into a new affiliation agreement for the 2016-2018 academic years. | The Crittenton Secured Claim shall be Reinstated, and paid in full in equal monthly installments over ten (10) years with interest at three percent (3%) per annum; provided that it is a condition precedent to the Effective Date that the Proponent/Debtor and Crittenton have agreed, in form and substance agreeable to Proponent, whether that certain Graduate Medical Education Affiliation Agreement between Crittenton and the Debtor dated April 14, 2011 will be assumed and whether any new Medicare graduate medical education affiliation agreements will be proposed. | A payment of \$1 million on the Effective Date. In addition, the Reorganized Debtor will assume, as amended, the graduate medical affiliation agreement between the Debtor and Crittenton, with no cure amount payable and a waiver by Crittenton of any pre-Effective Date defaults, and enter into a new affiliation agreement for the 2016-2018 academic years |

| Class of Claims | Sant Plan | Save the Hospital Plan | Allied Global Consulting Plan |
|---------------------------------------|---|---|---|
| Class 4 - CMS Overpayment Claims | Reinstated and the participation agreements between the Debtor and CMS will be deemed assumed. | Reinstated and the participation agreements between the Debtor and CMS will be deemed assumed. | Reinstated and the participation agreements between the Debtor and CMS will be deemed assumed. |
| Class 5 - Michigan Overpayment Claims | Reinstated and the participation agreements between the Debtor and Michigan will be assumed. | Reinstated and the participation agreements between the Debtor and Michigan will be assumed. | Reinstated and the participation agreements between the Debtor and Michigan will be assumed. |
| Class 6 - WRC Secured Claims | Sixty (60) equal monthly payments of \$13,237.76 over a five year period commencing on the first day of the month following the Effective Date with no interest accruing for the period after the Petition Date. | Sixty (60) equal monthly payments of \$13,237.76 over a five year period commencing on the first day of the month following the Effective Date with no interest accruing for the period after the Petition Date. | Sixty (60) equal monthly payments of \$13,237.76 over a five year period commencing on the first day of the month following the Effective Date with no interest accruing for the period after the Petition Date. |
| Class 7 - General Unsecured Claims | A <i>pro rata</i> share of Trust Beneficial Interests, which includes the right to pursue identified causes of action plus the Trust Guaranteed Cash Payment to the Trust in the amount of up to \$1,600,000 to be paid over a five (5) year period without interest. | A payment of 10% of the amount of the Claim paid over five (5) years without interest. Based upon estimated Class 7 claims of \$13,000,000, this would represent payment to Class 7 of \$1,300,000 over a five (5) year period. The difference between this unsecured claim estimate and the Sant estimate is the treatment by the Save the Hospital Group of the Crittenton Hospital claim as fully secured. | A <i>pro rata</i> share of Trust Beneficial Interests, which includes the right to receive proceeds in a liquidating trust that will be funded with \$150,000 in cash and have the ability to pursue certain identified causes of action. |
| Class 8 - Old Equity Interests | Cancelled | Cancelled | Cancelled |

6. **The Confirmation Hearing Date.** The hearing (“**Confirmation Hearing**”) on the final approval of the Disclosure Statements will be consolidated with the hearing on the confirmation of the Plans, which hearing has been set for **December 17, 2015 at 11:30 a.m. (Eastern Time)** at the U.S. Bankruptcy Court for the Eastern District of Michigan located at Courtroom 1042, 231 West Lafayette Street, Detroit, MI 48226. The Confirmation Hearing may be adjourned from time to time without further notice except for an announcement of the adjourned date made at the hearing.

7. **Confirmation Objection Deadline.** The deadline for filing objections to confirmation of either of the Plans is **December 11, 2015 at 4:30 p.m. (Eastern Time)** (the “**Confirmation Objection Deadline**”).

8. **Objections to the Plans.** All objections, if any, to a Plan must: (a) be in writing; (b) conform to the Bankruptcy Rules, the Local Bankruptcy Rules, and any orders of the Bankruptcy Court; (c) state the name and address of the objecting party; (d) state with particularity the basis and nature of any objection to the Plan and may propose language to remedy such objection; and (e) be filed with the Bankruptcy Court and served so that it is **actually received** on or prior to the Confirmation Objection Deadline by the following parties:

- a. To Sant: Honigman Miller Schwartz and Cohn LLP, 2290 First National Building, 660 Woodward Avenue, Detroit, MI 48226; Attn: E. Todd Sable and Glenn Walter;
- b. To Save the Hospital Group: Sheldon S. Toll, PLLC, 29580 Northwestern Hwy., Suite 100, Southfield, MI 48034; Attn: Sheldon S. Toll;
- c. To Allied: Kenneth R. Beams, PLLC, 2145 Crooks, Suite 220, Troy, MI 48226; Attn: Kenneth R. Beams;
- d. To the Chapter 11 Trustee: Simon, Stella & Zingas, P.C., 645 Griswold, Suite 3466, Detroit, MI 48226; Attn: Stephen P. Stella;
- e. To the Committee: Simon PLC, 363 W. Big Beaver Rd., Suite 250, Troy, MI 48084; Attn: Craig T. Mierzwa; and
- f. The Office of the United States Trustee, 211 W. Fort Street, Suite 700, Detroit, MI 48226; Attn: Leslie K. Berg.

9. **Obtaining Solicitation Materials.** If you received Solicitation Package materials in CD-ROM format and desire paper copies, or if you need to obtain additional Solicitation Packages, you may: (a) contact the Voting Agent at: Oakland Physicians Medical Center, L.L.C. Ballot Processing, c/o UpShot Services LLC, 7808 Cherry Creek South Drive, Suite 112, Denver, CO 80213 or via telephone at (855) 812-6112; or (b) download such documents (for a fee) by visiting the Bankruptcy Court's website at <http://www.mieb.uscourts.gov>.

10. **Filing the Plan Supplements.** Each Plan proponent will file a notice to be received by all parties requesting ECF notifications of filings in this chapter 11 case that will: (i) inform parties that the Plan proponent filed the respective Plan Supplement; and (ii) list the information contained in the Plan Supplement. Parties may obtain copies of the respective Plan Supplements by contacting counsel for the applicable Plan proponent at the addresses below.

BINDING NATURE OF THE PLANS

THE CONFIRMED PLAN SHALL BIND ALL HOLDERS OF CLAIMS AND EQUITY INTERESTS TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, WHETHER OR NOT SUCH HOLDER WILL RECEIVE OR RETAIN ANY PROPERTY OR INTEREST IN PROPERTY UNDER THE CONFIRMED PLAN, HAS FILED A PROOF OF CLAIM IN THE DEBTOR'S BANKRUPTCY CASE, OR FAILED TO VOTE TO ACCEPT OR REJECT THE CONFIRMED PLAN, OR VOTED TO REJECT THE CONFIRMED PLAN.

Date: [____], 2015

HONIGMAN MILLER SCHWARTZ AND COHN LLP
Counsel for Sant Partners, LLC

By: /s/
E. Todd Sable (P54956)
Glenn S. Walter (P79853)
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226
Telephone: (313) 465-2876
Facsimile: (313) 465-8000
Email: tsable@honigman.com

-and-

SHELDON S. TOLL PLLC
Counsel for Save the Hospital Group

By: /s/
Sheldon S. Toll (P21490)
29580 Northwestern Hwy.
Suite 100
Southfield, MI 48034
Telephone: (248) 797-9111
Email: [sst@lawtoll.com](mailto:ss@lawtoll.com)

-and-

KENNETH R. BEAMS, PLLC

Counsel for Allied Global Consulting

By: /s/
Kenneth R. Beams (P63248)
2145 Crooks
Suite 200
Troy, MI 48084
Telephone: (248) 396-3987
Email: kennethbeams@gmail.com

EXHIBIT D

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In Re:

OAKLAND PHYSICIANS MEDICAL
CENTER, L.L.C. d/b/a DOCTORS'
HOSPITAL OF MICHIGAN, a Michigan
Limited Liability Corporation,

Case No. 15-51011-ws
Chapter 11

Debtor.

Hon. Walter Shapero

NOTICE OF CONFIRMATION HEARING

TO: ALL HOLDERS OF CLAIMS IN THE ABOVE-CAPTIONED CHAPTER 11 CASE

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. **Preliminary Approval of the Sant Disclosure Statement.** On November 17, 2015, Sant Partners, LLC (“**Sant**”), a plan proponent and a creditor and party-in-interest in the above-captioned chapter 11 case of Oakland Physicians Medical Center, L.L.C. d/b/a Doctors’ Hospital of Michigan (the “**Debtor**”) filed its Second Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center Proposed by Sant Partners, LLC [DE 268] (as may be amended from time to time, the “**Sant Plan**” and the “**Sant Disclosure Statement**”). Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Sant Plan. The Bankruptcy Court for the Eastern District of Michigan (the “**Bankruptcy Court**”) has preliminarily approved the Sant Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

2. **Preliminary Approval of the Save the Hospital Disclosure Statement.** On November 17, 2015, Save the Hospital Group (“**Save the Hospital**”), a plan proponent and a creditor and party-in-interest in the Debtor’s chapter 11 case filed its Second Amended Combined Plan of Reorganization and Disclosure Statement [DE 266] (as may be amended from time to time, the “**Save the Hospital Plan**” and the “**Save the Hospital Disclosure Statement**”). The Bankruptcy Court has preliminarily approved the Save the Hospital Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

3. **Preliminary Approval of the Allied Global Consulting Disclosure Statement.** On November 17, 2015, Allied Global Consulting (“**Allied**”), a plan proponent and a creditor and party-in-interest in the Debtor’s chapter 11 case filed its First Amended Combined Disclosure Statement and Plan of Reorganization of Oakland Physicians Medical Center L.L.C. Proposed by Allied Global Consulting [DE 272] (as may be amended from time to time, the “**Allied Plan**” and the “**Allied Disclosure Statement**,” and, collectively, with the Sant Plan,

Save the Hospital Plan, Sant Disclosure Statement, and Save the Hospital Disclosure Statement the “**Plans**” and the “**Disclosure Statements**”). The Bankruptcy Court has preliminarily approved the Allied Disclosure Statement as containing adequate information pursuant to section 1125 of the Bankruptcy Code, by entry of an order on [DATE], 2015, subject to final approval.

4. **Voting Deadline.** The deadline for voting on the Plans is **4:30 p.m., prevailing Eastern Time, on December 11, 2015** (the “**Voting Deadline**”). If you received a Solicitation Package, including a Ballot, and intend to vote on the Plans, in order for your vote to be counted you must: (a) follow the instructions carefully and (b) complete all the required information on the Ballot so that it is **actually received** by UpShot Services LLC (the “**Voting Agent**”) according to and as set for in detail in the voting instructions on or before the Voting Deadline. A failure to follow such instructions may disqualify your vote.

5. **The Confirmation Hearing Date.** The hearing (“**Confirmation Hearing**”) on the final approval of the Disclosure Statements will be consolidated with the hearing on the confirmation of the Plans, which hearing has been set for **December 17, 2015 at 11:30 a.m. (Eastern Time)** at the U.S. Bankruptcy Court for the Eastern District of Michigan located at Courtroom 1042, 231 West Lafayette Street, Detroit, MI 48226. The Confirmation Hearing may be adjourned from time to time without further notice except for an announcement of the adjourned date made at the hearing.

6. **Confirmation Objection Deadline.** The deadline for filing objections to confirmation of either of the Plans is **December 11, 2015 at 4:30 p.m. (Eastern Time)** (the “**Confirmation Objection Deadline**”).

7. **Differences in the Plans.** The Plans propose different equity investments to acquire ownership in the reorganized Debtor, and propose different treatment for certain Classes of Claims and Equity Interests. You are encouraged to read the Disclosure Statements in their entirety to make an assessment of the feasibility of the proposed Plans.

8. **Obtaining Solicitation Materials.** If you received Solicitation Package materials in CD-ROM format and desire paper copies, or if you need to obtain additional Solicitation Packages, you may: (a) contact the Voting Agent at: Oakland Physicians Medical Center, L.L.C. Ballot Processing, c/o UpShot Services LLC, 7808 Cherry Creek South Drive, Suite 112, Denver, CO 80213 or via telephone at (855) 812-6112; or (b) download such documents (for a fee) by visiting the Bankruptcy Court's website at <http://www.mieb.uscourts.gov>.

BINDING NATURE OF THE PLANS

THE CONFIRMED PLAN SHALL BIND ALL HOLDERS OF CLAIMS AND EQUITY INTERESTS TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, WHETHER OR NOT SUCH HOLDER WILL RECEIVE OR RETAIN ANY PROPERTY OR INTEREST IN PROPERTY UNDER SUCH PLAN, HAS FILED A PROOF OF CLAIM IN THE DEBTOR’S BANKRUPTCY CASE, OR FAILED TO VOTE TO ACCEPT OR REJECT THE CONFIRMED PLAN, OR VOTED TO REJECT THE CONFIRMED PLAN.

HONIGMAN MILLER SCHWARTZ AND COHN LLP
Counsel for Sant Partners, LLC

E. Todd Sable (P54956)
Glenn S. Walter (P79853)
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226
Telephone: (313) 465-2876
Email: tsable@honigman.com

-and-

SHELDON S. TOLL PLLC

Counsel for Save the Hospital Group
Sheldon S. Toll (P21490)
29580 Northwestern Hwy.
Suite 100
Southfield, MI 48034
Telephone: (248) 797-9111
Email: sst@lawtoll.com

-and-

KENNETH R. BEAMS, PLLC

Counsel for Allied Global Consulting

Kenneth R. Beams (P63248)
2145 Crooks
Suite 200
Troy, MI 48084
Telephone: (248) 396-3987
Email: kennethbeams@gmail.com

Signed on November 18, 2015

/s/ Walter Shapero
Walter Shapero
United States Bankruptcy Judge