

**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

Hon. Walter Shapero

Debtor.

**NOTICE OF POSSIBLE ASSUMPTION OR REJECTION OF EXECUTORY
CONTRACTS AND UNEXPIRED LEASES AND DEADLINES RELATED THERETO**

**TO: ALL COUNTERPARTIES TO EXECUTORY CONTRACTS AND UNEXPIRED
LEASES SET FORTH ON THE ATTACHED LIST OF ASSUMED CONTRACTS
AND LIST OF REJECTED CONTRACTS**

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**”).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 November 18, 2015, subject to final approval.

2. Treatment of Executory Contracts and Leases. A copy of the Sant Plan is included with this Notice. Article VII of the Plan explains the treatment of executory contracts and unexpired leases. The Exhibits to the Plan contain a list of Assumed Contracts and a list of Rejected Contracts, as well as the proposed cure amount for each Assumed Contract. Copies of those Exhibits are attached hereto. Sant reserves the right to amend the Assumed Contract List and Rejected Contract List at any time prior to the Confirmation Hearing. The Plan provides that all executory contracts and unexpired leases will be assumed or rejected, as the case may be, as set forth on such lists. The deadline to object to the assumption or rejection, as applicable, or to the proposed cure amount with respect to any proposed Assumed Contract is **December 11,**

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

2015 at 4:30 p.m. (Eastern Time) (the “**Objection Deadline**”). All such objections 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; and (e) be filed with the Bankruptcy Court and served so that it is **actually received** on or prior to the Objection Deadline by 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.

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

By: /s/ E. Todd Sable
E. Todd Sable (P54956)
Glenn S. Walter (P79853)
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226
Telephone: (313) 465-7548
Facsimile: (313) 465-7549
Email: tsable@honigman.com

Date: November 18, 2015

EXHIBIT D
List of Assumed Contracts¹

Name and Mailing Address, Including Zip Code, of Other Parties to Lease or Contract	Description of Executory Contract or Unexpired Lease	Cure Amount
American Federation of State, County and Municipal Employees AFL-CIO Local 100 - Council 25	9/6/09 Collective Bargaining Agreement	\$0
Baytree National Bank & Trust 9305 A Monroe Road Charlotte, NC 28270	Copier Lease	\$0
Catlin Specialty Insurance Company	Group Physician Professional Liability Policy	\$0
Chubb Group of Insurance Companies	General Liability/Property Insurance Policy	\$0
Cintas Document Management 48501 Main Street Plymouth, MI 48170	Document Shredding Service Agreement	\$0
CleanNet of Greater Michigan 9361 Broken Land Parkway Suite 208 Columbia, MD 21046	Housekeeping Services Agreement	\$0
Crittenton Hospital Medical Center 1101 W. University Rochester, MI 48307	4/14/11 Medicare GME Affiliated Agreement	Assumed as Modified under §3.3 of the Plan.
Guarantee Insurance P.O. Box 406012 Atlanta, GA 30384-6012	Workers Compensation	\$0
Guardian P.O. Box 67748 Dallas, TX 75267-7458	Administrative Fees Services	\$0
Guardian P.O. Box 824395 Philadelphia, PA 19182-4395	Employee Dental, Vision, STD, Voluntary Life Insurance	\$0
International Union, United Automobile, Aerospace & Agricultural Implement Workers of America, UAW, Local 6911 - Region 1	March 2013 Collective Bargaining Agreement	\$0
McLaren Health Plan P.O. Box 1511 Flint, MI 48501-1511	Employee Health/Prescription Coverage	\$0

¹ The Plan Sponsor reserves the right to amend this list at any time prior to entry of the Confirmation Order.

Molina Healthcare of Michigan, Inc. 100 West Big Beaver Road Suite 600 Troy, MI 48084	11/7/08 Hospital Services Agreement	\$0
Oakland Integrated Healthcare Network 22200 W. Nine Mile Road Southfield, MI 48075	Shared Physician Agreement	\$0
Prudential Security, Inc.	Security Contract Management Agreement	\$0
Shambaugh & Son 21661 Melrose Southfield, MI 48075	Fire Alarm Systems Maintenance Agreement	\$0
Travelers Insurance	Auto Insurance Policy	\$0
Wisconsin Physicians Service Medicare Part A P.O. Box 8810 Marion, IL 62959	Medicare Provider Agreement	Assumed under §3.3 of the Plan.

EXHIBIT E
List of Rejected Contracts¹

Name and Mailing Address, Including Zip Code, of Other Parties to Lease or Contract	Description of Executory Contract or Unexpired Lease	Effective Date of Rejection
Next Services, Inc. 500 E. Eisenhower Parkway Suite 130 Ann Arbor, MI 48108	Billing service	Effective Date
Specialized Billing Services, LLC	Billing service	Effective Date
Ray Breitenbach 3901 Highland Road Suite D Waterford, MI 48328	Chief of Staff agreement	Effective Date
Ross University School of Medicine	All contracts	Effective Date
American University of the Caribbean School of Medicine	All contracts	Effective Date
St. George's University Granada	All contracts	Effective Date
American University of Antigua	All contracts	Effective Date
Windsor University School of Medicine	All contracts	Effective Date
Dr. Yatinder Singhal 3541 Ridgeview Court Bloomfield Hills, MI 48302	All contracts	Effective Date
Dr. Anuj Mittal 2600 Lone Pine Road West Bloomfield, MI 48323	All contracts	Effective Date

¹ The Plan Sponsor reserves the right to amend this list at any time prior to entry of the Confirmation Order.

Dr. Michael Short 42505 Woodward Avenue Suite 103 Bloomfield Hills, MI 48304	All contracts	Effective Date
Hallmark Health Services, Inc. John Oram 3100 Northwestern Highway Suite 200 Farmington, MI 48334	Fee Arrangement	Effective Date
John Oram 3100 Northwestern Highway Suite 200 Farmington, MI 48334	All contracts	Effective Date
Dr, Brijinder Gupta 145 S. Seminole Street Pontiac, MI 48341	employment agreement dated July 2, 2015 and any other contract	Effective Date