

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:	§	
	§	
GAINESVILLE HOSPITAL DISTRICT	§	Case No. 17-40101
D/B/A NORTH TEXAS MEDICAL	§	
CENTER, ¹	§	
	§	Chapter 9
DEBTOR.	§	

EX PARTE

ADVERSARY NO. 17-04072

GAINESVILLE HOSPITAL DISTRICT
D/B/A NORTH TEXAS MEDICAL
CENTER

LIST OF WITNESSES AND EXHIBITS FOR AUGUST 21, 2017 HEARING

TO THE HONORABLE BRENDA T. RHOADES,
UNITED STATES BANKRUPTCY JUDGE:

Gainesville Hospital District d/b/a North Texas Medical Center (the “Debtor”), by and through its undersigned counsel hereby designates the following witnesses and exhibits (the “Witness and Exhibit List”) for the hearing scheduled on **Monday, August 21, 2017, at 10:00 a.m. (CST)** before the Honorable Brenda T. Rhoades, United States Bankruptcy Court, 660 N. Central Expressway, Suite 300-B, Plano, Texas 75074.

The following matters have been set for hearing:

1. Original Complaint/Petition for Expedited Declaratory Judgment [Dkt. No. 1].

A. WITNESSES

1. Robbie Baugh, Board Chair, North Texas Medical Center;
2. Michael Muth, F.S.A., Rudd & Wisdom (via proffer);

¹ The last four digits of the District’s federal tax identification number are: 1664. The location of the District’s principal place of business and the service address is: 1900 Hospital Blvd., Gainesville, TX 76240.

3. Jeff Layne, Partner, Norton Rose Fulbright US LLP (via proffer);
4. Gerard Hebert, Chief Financial Officer, Texoma Medical Center (via proffer);
- 5.
6. Jennifer Claymon, Partner, Reed, Claymon, Meeker & Hargett (via proffer);
7. Laura Alexander, Managing Director, Hilltop Securities, Inc. (via proffer);
8. Any witness necessary to authenticate a document;
9. Any rebuttal and/or impeachment witnesses; and
10. All persons listed on the witness list of any other party.

B. EXHIBITS

Debtor's Exhibit No.	Description of Exhibit	OFFERED	OBJECTION	ADMITTED
1.	Form of Notice of Hearing to be published pursuant to §1205.041 [Exhibit 1 to Docket No. 1]			
2.	Form of Notice of Hearing to Creditors to be published pursuant to §1205.041 [Exhibit 1A to Docket No. 1]			
3.	Board Resolution dated July 22, 1975 calling for an election to confirm the creation of the District [Exhibit 2 to Docket No. 1]			
4.	August 26, 1975 Board Minutes of the District's board meeting which includes the order canvassing returns and declaring the results of the election in which the District's creation was approved by the voters within the District [Exhibit 3 to Docket No. 1]			
5.	Map of the District's service area [Exhibit 4 to Docket No. 1]			
6.	List of Prepetition Obligations that remain outstanding and unpaid as of the date of			

Debtor's Exhibit No.	Description of Exhibit	OFFERED	OBJECTION	ADMITTED
	the petition [Exhibit 5 to Docket No. 1]			
7.	Interim DIP Order [Exhibit 6 to Docket No. 1]			
8.	Final DIP Order [Exhibit 7 to Docket No. 1]			
9.	DIP Loan [Exhibit 8 to Docket No. 1]			
10.	Pension Plan [Exhibit 9 to Docket No. 1]			
11.	Actuarial Valuation [Exhibit 10 to Docket No. 1]			
12.	Management Services Agreement [Exhibit 11 to Docket No. 1]			
13.	Order Authorizing Bond Issuance [Exhibit 12 to Docket No. 1]			
14.	DIP Loan Funding [Exhibit 13 to Docket No. 1]			
15.	Notice of Hearing on Original Complaint/Petition for Expedited Declaratory Judgment [Docket No. 7]			
16.	Certificate of Service for Notice of Hearing on Original Complaint/Petition for Expedited Declaratory Judgment [Docket No. 8]			
17.	Affidavit of Service of Publication of Legal Notice from Austin American-Statesman [Docket No. 11]			
18.	Affidavit of Service of Publication of Legal Notice from Dallas Morning News [Docket No. 13]			
19.	Affidavit of Service of Publication of Legal Notice from Gainesville Daily Register [Docket No. 12]			
20.	NTMC schedule of prepetition obligations			
21.	NTMC Board minutes – December of 2016			

Debtor's Exhibit No.	Description of Exhibit	OFFERED	OBJECTION	ADMITTED
22.	Hilltop Financial Consulting Agreement, dated 8/2/16			
23.	Pension Plan FAQs (from NTMC online website)			

The Debtor reserves the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing lists of witnesses and exhibits as appropriate. The Debtor also reserves the right to rely upon and use as evidence (i) exhibits included on the exhibit lists of any other parties in interest, and (ii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: August 17, 2017
Dallas, Texas

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ William R. Greendyke,
William R. Greendyke (SBT 08390450)
Julie Goodrich Harrison (SBT 24092434)
1301 McKinney Street, Suite 5100
Houston, Texas 77010-3095
Telephone: (713) 651-5151
Facsimile: (713) 651-5246
william.greendyke@nortonrosefulbright.com
julie.harrison@nortonrosefulbright.com

AND

Ryan E. Manns (SBT 24041391)
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201-7932
Telephone: (214) 855-8000
Facsimile: (214) 855-8200
ryan.manns@nortonrosefulbright.com

**COUNSEL FOR THE DEBTOR AND
DEBTOR-IN-POSSESSION**