

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

In re:

**STEWARD HEALTH CARE SYSTEM,
LLC, et al.,**

Debtors.

Chapter 11

Case No: 24-90213 (CML)

Jointly Administered

**LIMITED OBJECTION AND RESERVATION OF RIGHTS OF THE ROMAN
CATHOLIC ARCHBISHOP OF BOSTON, A CORPORATION SOLE TO THE
SALE OF CERTAIN MASSACHUSETTS HOSPITALS AND RELATED ASSETS**

The Roman Catholic Archbishop of Boston, A Corporation Sole (“RCAB”) hereby files this limited objection and reservation of rights concerning the Debtors proposed sale of certain Caritas Hospitals¹ (the “Proposed Sales”), and respectfully states as follows:

1. Care for the sick, the dying and the poor is a ministry deeply rooted in the history of the Roman Catholic Church.
2. The Caritas Hospitals play a critical role in meeting the health care needs of Massachusetts patients and the communities within which the hospitals operate. The RCAB, for its part, supports the continued operation of the Caritas Hospitals in a safe, responsible manner.
3. On August 4, 2024, the Debtors continued the Sale Hearing on the Debtors’ Massachusetts Hospitals (including certain Caritas Hospitals) from August 13, 2024 to August 16, 2024 [ECF No. 1934].

¹ Capitalized words not otherwise defined have the meaning ascribed to them in the *Response and Limited Objection of the Roman Catholic Archbishop of Boston, A Corporation Sole, the Debtors’ Emergency Motion For Entry of An Order (I) Approving Global Bidding Procedures For Sales Of Debtors’ Assets, (B) Form and Manner of Notice Of Sales, (C) Assumption and Assignment Procedures And Form and Manner Of Notice Of Assumption And Assignment; (II) Authorizing Designation Of Stalking Horse Bidders; (III) Scheduling Auctions And Sale Hearing; And (IV) Granting Related Relief* [ECF No. 28].

4. As of the date of this filing, however, the Debtors have not disclosed, as required by the Court's Bidding Procedures Order [ECF No. 626], the successful bidders for the Proposed Sales of the Caritas Hospitals or filed proposed orders or asset purchase agreements indicating the terms of the Proposed Sales.

5. Under the circumstances, the RCAB reluctantly files this limited objection and reservation of rights to preserve its rights, claims and defenses with respect to: (a) the Proposed Sales; and (b) under the Stewardship Agreement dated as of April 30, 2010.²

6. The RCAB reserves all rights to supplement this objection when the Debtors disclose the terms of the Proposed Sales and raise any other objections, including lack of required notice of the terms of the Proposed Sales.

Respectfully submitted,

Dated: August 13, 2024

MORRISSEY, WILSON & ZAFIROPOULOS, LLP

/s/ Francis C. Morrissey

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and

MURPHY & KING, PC

/s/ D. Ethan Jeffery

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² A copy of the Agreement is attached to RCAB's Limited Objection to the Bidding Procedure Order [ECF No. 558].

**COUNSEL TO
ROMAN CATHOLIC ARCHBISHOP OF BOSTON,
A CORPORATION SOLE**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of this Objection was served by the Court's CM/ECF system on August 13, 2024, upon those parties who are entitled to service through that system.

/s/ D. Ethan Jeffery _____