

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
	§	
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, <i>et al.</i> ,	§	
	§	(Jointly Administered)
Debtors. ¹	§	Re: Docket No. 281
	§	

**NOTICE OF FILING OF REVISED PROPOSED ORDER
(I) APPROVING (A) GLOBAL BIDDING PROCEDURES FOR SALES
OF THE DEBTORS' ASSETS, (B) FORM AND MANNER OF NOTICE
OF SALES, AUCTIONS, AND SALE HEARINGS, AND (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 HEARINGS; AND (IV) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT, on May 6, 2024, Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (the “**Debtors**”), each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code.

PLEASE TAKE FURTHER NOTICE THAT, on May 15, 2024, the Debtors filed the *Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors' Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (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 Hearings; and (IV) Granting Related Relief* (Docket No. 281)

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/Steward>. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

(the “**Motion**”), with a proposed order granting the relief requested in the Motion attached thereto as Exhibit A (the “**Proposed Order**”).

PLEASE TAKE FURTHER NOTICE THAT, the Debtors hereby file a revised proposed *Order (I) Approving (A) Global Bidding Procedures for Sales of the Debtors’ Assets, (B) Form and Manner of Notice of Sales, Auctions, and Sale Hearings, and (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 Hearings; and (IV) Granting Related Relief*, attached hereto as Exhibit A (the “**Revised Proposed Order**”).

PLEASE TAKE FURTHER NOTICE THAT, a redline of the Revised Proposed Order marked against the Proposed Order is attached hereto as Exhibit B.

PLEASE TAKE FURTHER NOTICE THAT, multiple parties filed limited objections and/or reservations of rights to the Motion (Docket Nos. 445, 497, 499, 505, 507, 509, 511, 513, 514, 515, 516, 517, 518, 519, 520, 558) (collectively, the “**Responses**”). The Revised Proposed Order resolves some, but not all, of the Responses. In addition, the Revised Proposed Order reflects informal comments received from various parties in interest.

PLEASE TAKE FURTHER NOTICE THAT, the hearing (the “**Hearing**”) to consider the relief requested in the Motion is scheduled for **June 3, 2024 at 1:00 p.m. (Central Time)**. The Debtors reserve all rights to alter, amend, update, or modify the Revised Proposed Order at or prior to the hearing on the Motion.

Dated: May 31, 2024
Houston, Texas

/s/ Clifford W. Carlson
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-and-

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*Proposed Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on May 31, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas, and will be served as set forth in the Affidavit of Service to be filed by the Debtors' claims, noticing, and solicitation agent.

/s/ Clifford W. Carlson
Clifford W. Carlson

Exhibit A

Revised Proposed Order