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**ATTORNEYS FOR DEBTOR**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re:	§	Chapter 11
	§	
FOREST PARK MEDICAL CENTER AT	§	Case No. 16-40273-rfn-11
SOUTHLAKE, LLC,	§	
	§	HEARING DATE AND TIME:
Debtor.	§	August 18, 2016 @ 9:30 a.m.

**DEBTOR'S WITNESS AND EXHIBIT LIST FOR AUGUST 18, 2016 HEARING**

Forest Park Medical Center at Southlake, LLC ("FPMC Southlake" or the "Debtor")  
hereby submits this Witness and Exhibit List for the August 18, 2016 Hearing on the following  
matters:

- First Amended Disclosure Statement Under 11 U.S.C. § 1125 in Support of the First Amended Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code [Docket No. 314] (the "First Amended Disclosure Statement");
- First Amended Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code [Docket No. 313] (the "First Amended Plan");
- Plan Supplement to the First Amended Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code [Docket No. 339] (the "Plan Supplement");

- First Interim Application of Haynes and Boone, LLP, Attorneys for the Debtor, for Allowance and Payment of Compensation and Reimbursement of Expenses Advanced [Docket No. 323] (the “H&B Fee Application”);
- First Interim Fee Application of FTI Consulting, Inc., as Chief Restructuring Officer and Restructuring Officer for the Debtor, for Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred From January 25, 2016 Through May 31, 2016 [Docket No. 324] (the “FTI Fee Application”); and
- First Application of Donlin, Recano & Company, Inc. for Allowance of Interim Compensation for Professional Services Rendered and for Reimbursement of Expenses Incurred as Administrative Agent for the Debtor and Debtor-In-Possession From January 19, 2016 Through May 31, 2016 [Docket No. 329] (the “DRC Fee Application”).

### **WITNESSES**

The Debtor designates the following individual who may be called as a witness at the August 18, 2016 Hearing (exclusive of those that may be used for impeachment purposes):

1. Walt Brown, Restructuring Officer of Debtor

The Debtor reserves the right to call any witnesses designated by any other party.

### **EXHIBITS**

The Debtor designates the following exhibits that may be used at the August 18, 2016 Hearing (exclusive of those that may be used for impeachment purposes):

Exhibit Number	DESCRIPTION	J U D I C I A L  N O T I C E	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disp. After Trial
1.	Order Approving Debtor's Expedited Motion for Entry of an Order (I) Scheduling Combined Hearing on Approval of Disclosure Statement and Confirmation of Plan of Liquidation, (II) Conditionally Approving Disclosure Statement, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan and (IV) Approving Related Matters [Docket No. 318]							
2.	The First Amended Disclosure Statement, including: Exhibit 1 – The First Amended Plan and all attached Exhibits Exhibit 2 – Ownership Structure Exhibit 3 – Pre-Petition Transfers Exhibit 4 – Liquidation Analysis Exhibit 5 – Plan Recovery Analysis							
3.	First Amended Plan, including: Exhibit A – Glossary of Defined Terms Exhibit B – Rights of Action							
4.	Plan Supplement, including: Exhibit A – Publication Notice Exhibit B – Patient Records Mail Notice Exhibit C – Liquidation Trust Agreement Exhibit D – Identity of Liquidation Trustee Exhibit E – Remaining Executory Contracts/Unexpired Leases to Assume							

Exhibit Number	DESCRIPTION	J U D I C I A L  N O T I C E	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disp. After Trial
5.	Notice of Hearing to Consider Final Approval of Disclosure Statement and Confirmation of Chapter 11 Plan of Liquidation of the Debtor Under Chapter 11 of the Bankruptcy Code [Docket No. 321]							
6.	Affidavit of Donlin, Recano & Company, Inc. Regarding Service of Solicitation Packages With Respect to First Amended Disclosure Statement Under 11 U.S.C. § 1125 in Support of the First Amended Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code [Docket No. 333]							
7.	Declaration of Jung W. Song on Behalf of Donlin, Recano & Company, Inc. Regarding Voting and Tabulation of Ballots Accepting and Rejecting Plan of Liquidation for Forest Park Medical Center at Southlake, LLC Under Chapter 11 of the United States Bankruptcy Code [Docket No. 346]							
8.	Proposed Findings of Fact and Conclusions of Law [Docket No. ____]							
9.	Invoices for Haynes and Boone, LLP (Schedules A-N to the H&B Fee Application)							

Exhibit Number	DESCRIPTION	J U D I C I A L  N O T I C E	M A R K E D	O F F E R E D	O B J E C T	A D M I T	D A T E	Disp. After Trial
10.	Time Entry Records and Expense Records of FTI Consulting, Inc. (Exhibits C and D to the FTI Fee Application)							
11.	Invoices for Donlin, Recano & Company, Inc. (Schedule A to the DRC Fee Application)							

The Debtor asks that the Court take judicial notice of the pleadings and transcripts filed (including any and all schedules, amendments, exhibits, and other attachments thereto) in the proceedings before this Court. The Debtor reserves the right to use any exhibits presented by any other party. The Debtor reserves the right to amend and/or supplement this exhibit list. The Debtor also reserves the right to use exhibits not listed herein for impeachment purposes at the August 18, 2016 Hearing.

Respectfully submitted this 16th day of August, 2016.

**HAYNES AND BOONE, LLP**

By: /s/ Stephen M. Pezanosky

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