

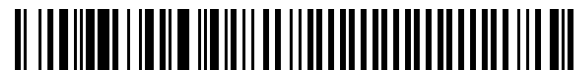
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

_____	x	
In re	:	
	:	Chapter 11
HOSPITAL FOR SPECIAL SURGERY, LLC	:	
<i>Db</i> a ONECORE HEALTH,	:	Case No. 24-12862-JDL
	:	
Debtor.	:	
_____	x	

**DEBTOR’S RESPONSE TO AWIC’S MOTION FOR RELIEF
FROM AUTOMATIC STAY AND WAIVER UNDER RULE 4001(a)(4)**

Hospital for Special Surgery, LLC *dba* OneCore Health (“OneCore” or the “Debtor”) hereby gives notice that it does not object to Allied World Insurance Company’s (“AWIC”) *Motion for Entry of Order Granting (I) Relief from Automatic Stay and (II) Waiver of the Stay Under Rule 4001(a)(4), to the Extent Applicable, to Permit Allied World to Advance and/or Reimburse Covered Loss Up to the Remaining Limits of Liability Under Certain Insurance Policies* (the “Motion”) [Dkt. No. 223]. The relief requested is intended to remove any doubt that, with respect to earlier relief granted by the Court which provided limited relief from the automatic stay to enable certain individuals to pursue the insurance proceeds referred to in AWIC’s Motion, AWIC may pay Loss, including Defense Expenses (as those terms are defined in the Motion), under the applicable insurance policies. *See* Agreed Orders, at Dkt. Nos. 152 and 153. Additionally, Debtor has agreed to support the relief in furtherance of its ongoing negotiations and agreements as disclosed in relationship to its proposed chapter 11 plan of reorganization, including, without limitation, AWIC’s agreement to partially fund the Base Settlement¹ by and through its deposit of the proceeds of the general liability policy applicable to the Base Claim into the Litigation Trust’s

¹ Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the *Chapter 11 Plan of Reorganization of Hospital for Special Surgery, LLC dba OneCore Health* [Dkt. No. 221-1].



designated account on or before the Effective Date of the Plan.

Respectfully submitted,

ONECORE

/s/ Craig M. Regens

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