

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

Case No. 24-12862-JDL

**DEBTOR'S NOTICE OF WITNESS AND EXHIBIT LISTS
FOR FINAL HEARING ON TIMOTHY W. FOX'S
(I) MOTION FOR RELIEF FROM AUTOMATIC STAY [DKT. NO. 206] AND
(II) MOTION TO ALLOW CLAIM AS TIMELY FILED [DKT. NO. 242]**

Hospital for Special Surgery, LLC *dba* OneCore Health (“OneCore” or the “Debtor”) hereby gives notice, pursuant to rule 9014-1 of the Local Rules for the United States Bankruptcy Court for the Western District of Oklahoma (the “Local Bankruptcy Rules” and the “Bankruptcy Court,” respectively), of the witnesses it intends to call and the exhibits it intends to utilize during the hearing on the following motions and objections, which is set for **final hearing at 10:00 a.m. on May 13, 2025 before the Honorable Janice D. Loyd in the second-floor courtroom of the Bankruptcy Court for the Western District of Oklahoma, 215 Dean A. McGee Ave., Oklahoma City, OK 73102:**

- (a) *Timothy W. Fox's Motion for Relief From Automatic and Notice with Brief in Support and Notice of Opportunity for Hearing* filed March 17, 2025 [Dkt. No. 206];
- (b) *Debtor's Objection to Timothy W. Fox's Motion for Relief from Automatic Stay* filed April 1, 2025 [Dkt. No. 231];
- (c) *Timothy W. Fox's Motion to Allow Claim as Timely Filed and Notice With Brief in Support and Notice of Opportunity for Hearing* filed April 11, 2025 [Dkt. No. 242];
and



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(d) *Debtor's Objection to Timothy W. Fox's Motion to Allow Claim as Timely Filed* filed April 25, 2025 [Dkt. No. 265]

(collectively, the "Motions" and the "Objections").

Debtor expressly reserves the right to amend its lists of witnesses and exhibits as necessary or in the interests of justice. Debtor estimates that it shall need one hour to present evidence and argument concerning its Objections.

Witness List

No.	Witness	Anticipated Subject Matter of Testimony
1	Verita Global Representative	Testify regarding proof of service of Claims Bar Date Order and related documents on Fox and counsel, lateness of proof of claim, and proof of claim processing
2	Timothy W. Fox or Representative / Attorney Bret D. Davis of Lamun Mock Cunyningham & Davis, P.C	Pleadings, claims, and service of Claims Bar Date that are the subject of the Motion
3	Any witness necessary for impeachment or rebuttal	
4	Any witness listed by Timothy W. Fox to which Debtor does not object	

Exhibit List

No.	Description of Exhibit
1	<i>Voluntary Petition, Schedules and Statement of Financial Affairs</i> [Dkt. No. 1]
2	<i>Debtor's Amendments to (I) Schedules and (II) Statement of Financial Affairs</i> [Dkt. No. 208] and <i>Supplemental Amended List of Creditors and Schedules</i> [Dkt. No. 236]
3	<i>Order (I) Setting Bar Dates for Filing Proofs of Claim; (II) Approving Form and Manner for Filing Proofs of Claim; and (III) Approving the Form and Manager of Notice of Bar Dates</i> [Dkt. No. 140] (Court to take judicial notice)
4	<i>Claims Register</i> (Court to take judicial notice)

5	<i>Timothy Fox's Proof of Claim</i> [Claim 23] (Court to take judicial notice)
6	All documents evidencing service of the Claims Bar Date Order on Fox and his counsel
7	<i>OneCore Health's Notice of Suggestion of Pendency of Bankruptcy and Automatic Stay of These Proceedings</i> , OK Co District Court Case CJ-2023-3620, filed 10.11.2024
8	<i>Solicitation Procedures Order</i> [Dkt. No. 252]
9	<i>Chapter 11 Plan of Reorganization of Hospital for Special Surgery, LLC dba OneCore Health</i> [Dkt. No. 254]
10	<i>Certificate of Service of Angela Nguyen re: Solicitation Materials Served on April 23, 2025</i> [Dkt. No. 270]
11	Any exhibit listed by Timothy Fox to which Debtor does not object
12	Any exhibit necessary for impeachment or rebuttal

OneCore reserves its rights to amend or supplement its witness and exhibit lists.

Respectfully submitted,

ONECORE

/s/ Craig M. Regens

William H. Hoch, OBA #15788

Craig M. Regens, OBA #22894

Mark A. Craige, OBA #1992

Kaleigh M. Ewing, OBA #35598

-Of the Firm-

CROWE & DUNLEVY

A Professional Corporation

Braniff Building

324 N. Robinson Ave., Suite 100

Oklahoma City, OK 73102-8273

(405) 235-7700

will.hoch@crowedunlevy.com

craig.regens@crowedunlevy.com

mark.craige@crowedunlevy.com

kaleigh.ewing@crowedunlevy.com

Counsel to Debtor