

**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	

**DECLARATION OF CARRIE McENTIRE IN SUPPORT OF CONFIRMATION OF
CHAPTER 11 PLAN OF REORGANIZATION OF HOSPITAL FOR SPECIAL
SURGERY, LLC *dba* ONECORE HEALTH**

I, Carrie McEntire (“McEntire”), declarant pursuant to 28 U.S.C. § 1746, under penalty of perjury, to the best of my knowledge and believe, that:

1. I am the principal of McEntire Advisory, PLLC, a restructuring advisory services firm. I have personal knowledge of the matters set forth herein.

2. McEntire Advisory, PLLC, in its capacity as financial advisor to, and chief restructuring officer of, Debtor, has worked closely with Debtor’s management and other professionals in assisting with the myriad requirements associated with this Chapter 11 Case. Consequently, McEntire Advisory, PLLC has developed significant relevant experience and expertise regarding Debtor and the unique circumstances of this case.

3. McEntire has worked closely with the Debtor’s representatives, other members of the Debtor’s management team, and/or other interested parties, as applicable, in Plan negotiations, examining feasibility, preparing financial projections, and performing the Liquidation Analysis.

4. Except as otherwise indicated, the facts set forth in this Declaration (or incorporated by reference herein) are based on (i) my personal knowledge; (ii) my discussions with the Debtor’s representatives, other members of the Debtor’s management team, or other interested parties; (iii)



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my review of relevant documents; (iv) my opinion based upon my experience, knowledge, and information concerning the Debtor's financial affairs; and/or (v) the Debtor's financial projections. If called upon to testify, I would testify competently to the facts set forth herein. I am authorized to submit this Declaration on behalf of the Debtor.

Background

5. OneCore is a duly licensed hospital that has been specializing in orthopedic and specialty surgeries in the community of central Oklahoma for more than a decade. In late 2021, OneCore completed the construction of its present leased facility in northeast Oklahoma City and has been operating at such location since January 2022.

6. OneCore has focused on a culture of excellence in the delivery of surgical and other health care services such as radiology and orthopedic care with the goal of being one of the top performing surgical hospitals in Oklahoma. In the past four (4) years, OneCore has received many accolades for its excellence and patient care, including the following:

- Healthgrades: Knee Replacement 5-star recipient, 2023 and 2024;
- Healthgrades: Spinal Fusion Surgery 5-star recipient 2021 – 2024;
- Healthgrades: Outstanding Patient Experience 2024; and
- Press Ganey: Guardian of Excellence Award for Outstanding Patient Experience.¹

The Plan Satisfies the Bankruptcy Code's Requirements for Confirmation

7. Based on my understanding of the Plan, the events that have occurred throughout these Chapter 11 Cases, and discussions I have had with the Debtors' legal advisors regarding the requirements of the Bankruptcy Code, I believe that the Plan satisfies all provisions of section

¹ The Press Ganey Guardian of Excellence Award® honors organizations that perform in the top 5% of healthcare providers and health plans for patient experience, employee engagement, physician experience, clinical quality performance or consumer experience in one year. Only 501 hospitals and health systems achieved this recognition out of over 10,000.

1129 of the Bankruptcy Code and complies with all other applicable sections of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and applicable non-bankruptcy law and should therefore be confirmed.

8. Each of the factual averments made in the *Debtor's Memorandum of Law in Support of Confirmation of Chapter 11 Plan of Reorganization of Hospital for Special Surgery, LLC dba OneCore Health* [Dkt. No. 288] (the "Memorandum") is true and correct, and is hereby incorporated by reference as if fully set forth herein.

9. I prepared the Liquidation Analysis annexed as an exhibit to the Solicitation Version of the Debtor's Disclosure Statement. It was true and correct to the best of my knowledge, information, and belief, as of the date on which it was submitted. The underlying facts and the opinions set forth therein have not materially changed as of the date of this Declaration.

10. I prepared the Feasibility Analysis annexed as an exhibit to the Solicitation Version of the Disclosure Statement. It was true and correct to the best of my knowledge, information, and belief, as of the date on which it was submitted. The underlying facts and the opinions set forth therein have not materially changed as of the date of this Declaration.

11. I believe that under the circumstances, it is appropriate for the Court to permit the Debtor to consummate the Plan and commence its implementation without delay after entry of the Confirmation Order. I believe that a waiver of the 14-day stay is in the best interests of the Estate and all other parties in interest and will not prejudice any party in interest.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 9, 2025

MCENTIRE ADVISORY, PLLC

s/Carrie McEntire

Carrie McEntire

Managing Director

Dated: May 9, 2025

Respectfully submitted,

ONECORE

/s/Craig M. Regens

William H. Hoch, OBA #15788

Craig M. Regens, OBA #22894

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***Counsel to the Debtor and Debtor in
Possession***