

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

In re:	§	
	§	Chapter 11
	§	
STEWARD HEALTH CARE SYSTEM LLC, et al.,	§	Case No. 24-90213 (CML)
	§	
Debtors.¹	§	(Jointly Administered)
	§	Re: Docket No. 2146
	§	

**NOTICE OF CLOSURE OF NORWOOD HOSPITAL FACILITIES AND
ABANDONMENT OF PROPERTY IN CONNECTION THEREWITH**

PLEASE TAKE NOTICE that, on May 6, 2024 (the “**Petition Date**”),² Steward Health Care System LLC and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), each commenced with the United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”) a voluntary case under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”).

PLEASE TAKE FURTHER NOTICE that, on August 22, 2024, the Bankruptcy Court entered an order approving certain procedures for the closure of the Debtors’ Facilities on a final basis, among other things (Docket No. 2146) (the “**Facilities Closure Procedures Order**”). An electronic copy of the Facilities Closure Procedures Order can found at <https://restructuring.ra.kroll.com/Steward>.

PLEASE TAKE FURTHER NOTICE that, pursuant to the terms of the Facilities Closure Procedures Order, the Debtors hereby give notice of their intent to cease their operations of, and close, the satellite facilities relating to Norwood Hospital (800 Washington St., Norwood, MA 02062) (the “**Closing Facilities**”) in accordance with the terms set forth on **Annex A**, effective as of the date of closing listed for the Closing Facilities (the “**Facilities Closure Date**”).³

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.

² Capitalized terms used herein but not otherwise defined herein shall have the meanings ascribed to such terms in the *Emergency Motion of Debtors for Entry of an Order (I) Approving (A) Funding from the Commonwealth of Massachusetts for the Planned Transition and Sale of Massachusetts Hospitals, (B) the Closure of Carney Hospital and Nashoba Valley Medical Center, and (C) Procedures Related to Facility Closures; and (II) Granting Related Relief* (Docket No. 1711).

³ Norwood’s hospital operations ceased prior to the Petition Date. However, as of the date hereof, there are certain satellite facilities operating under the Norwood Hospital license, which license will expire per its terms on November 5, 2024.

The Debtors will close the Closing Facilities in a manner that ensures patient health and safety and ensures the preservation of records.

PLEASE TAKE FURTHER NOTICE that, the Debtors intend to abandon the personal property remaining in or on the property associated with the Closing Facilities in accordance with the Facilities Closure Procedures Order, including the restrictions set forth in paragraphs 10 and 11 thereof. Pursuant to the terms of the Facilities Closure Procedures Order, upon entry of the Facilities Closure Order (defined below), the applicable landlord shall be entitled to use or dispose of such abandoned personal property without further notice or order of the Court and without notice or liability for such disposal to the Debtors or any third party.

PLEASE TAKE FURTHER NOTICE that, any party wishing to object to the Debtors' proposed closing of a facility or abandonment of personal property remaining at such premises, must file with the Bankruptcy Court and serve a written objection setting forth the legal and factual bases for such objection (an "**Objection**") so that it is actually filed with the Bankruptcy Court and served on the following parties no later than ten (10) calendar days after the date of filing of this Facilities Closure Notice with the Bankruptcy Court (the "**Objection Deadline**"): (i) the Debtors c/o Steward Health Care System LLC, 1900 N. Pearl Street, Suite 2400, Dallas, TX 75201 (Attn: Legal Department); (ii) counsel to the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Ray C. Schrock, Esq. (ray.schrock@weil.com), and Candace M. Arthur, Esq. (candace.arthur@weil.com)); 700 Louisiana Street, Suite 3700, Houston, Texas 77002-2755 (Attn: Clifford W. Carlson, Esq. (clifford.carlson@weil.com) and Stephanie N. Morrison, Esq. (stephanie.morrison@weil.com)); and 1395 Brickell Avenue, Suite 1200 Miami, Florida 33131 (Attn: David J. Cohen, Esq. (davidj.cohen@weil.com)), (iii) the Notice Parties, and (iv) the applicable regulatory authorities.

PLEASE TAKE FURTHER NOTICE that if no Objection is filed and served in compliance with the foregoing, the Debtors may submit to the Bankruptcy Court after the Objection Deadline a proposed order approving the closing of the Closing Facilities and the abandonment of property in connection therewith (each such order, a "**Facilities Closure Order**"), substantially in the form annexed hereto as **Annex B**, and the Bankruptcy Court may enter such order without a hearing.

PLEASE TAKE FURTHER NOTICE that, if an Objection is properly filed and served in compliance with the foregoing and not withdrawn or resolved (an "**Unresolved Objection**"), the Debtors shall file a notice for a hearing for the Court to consider the Unresolved Objection after the Objection Deadline, subject to the Court's schedule. The Debtors may resolve the Unresolved Objection without further notice or Court approval in advance of the hearing. If the Unresolved Objection is overruled or withdrawn, the effective date of such Facilities Closure (and the abandonment of property in connection therewith) shall be the (i) the Facilities Closure Date; (ii) such other date to which the Debtors and party that filed the Unresolved Objection have agreed; or (iii) such other date as determined by the Court.

PLEASE TAKE FURTHER NOTICE that, to the extent you wish to assert a claim(s) on account of claim(s) arising out of a Facilities Closure, or abandonment of property in connection therewith, you must do so by the later of (i) the claims bar date established in these chapter 11 cases, and (ii) 30 days after entry of the Facilities Closure Order. If you do not timely

file such claim, you will not be treated as a creditor with respect to such claim for voting on any chapter 11 plan in the Debtors' chapter 11 cases and will be forever barred from asserting such claim and from participating in any distributions made in connection with these chapter 11 cases on account of such rejection damages.

Dated: October 7, 2024
Houston, Texas

/s/ Clifford W. Carlson
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*Attorneys for Debtors
and Debtors in Possession*

Certificate of Service

I hereby certify that on October 7, 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.

/s/ Clifford W. Carlson

Clifford W. Carlson

Annex A

Facilities Closure Notice

Facility Name	Norwood Hospital
Facility Address	800 Washington St., Norwood, MA 02062
Satellite Facilities	See Schedule 1
Proposed Closure Date	No later than November 5, 2024 (the “ Proposed Closure Date ”) *Debtors will adjust the date for cessation of clinical operations at each Satellite as necessary to ensure safe patient care.
Timeline for Closure	<p>At least 21 days prior to Proposed Closure Date:</p> <ul style="list-style-type: none"> • Send notification letter with proposed closure plan to MA DPH. • Send copy of notification letter to hospital PFAC, hospital staff, labor unions, MA General Court, elected officials, the Joint Commission, HPC, AGO, CHIA, EOLWD, and community groups. • Notify CMS regional office, Medicaid, and commercial payors. • Notify federal and state regulatory authorities including DEA, CLIA, DPH Drug Control Program and ACGME. • Form Command Center working group to oversee the safe and orderly closure of the satellites. <p>15 days prior to Proposed Closure Date:</p> <ul style="list-style-type: none"> • Post notice of closure at all entrances. <p>10 days prior to Proposed Closure Date:</p> <ul style="list-style-type: none"> • State holds public hearing (if necessary). <p>5 days prior to Proposed Closure Date:</p> <ul style="list-style-type: none"> • State issues determination that hospitals may close. <p>1 day prior to Proposed Closure Date:</p> <ul style="list-style-type: none"> • Close all ambulatory services at Satellites. <p>Ongoing:</p> <ul style="list-style-type: none"> • Discharge patients in the ordinary course, identify appropriate alternative locations for any outpatients who will need ongoing care and arrange for transfer. Participate in any required public hearings. <p>Proposed Closure Date:</p> <ul style="list-style-type: none"> • Submit 855A Application to MAC to voluntarily terminate Medicare enrollment.
Plan for Employees	The Debtors also intend to attempt to assist employees in finding job placement elsewhere, including by notifying the Massachusetts Department of Labor and Department of Unemployment Assistance.

	<p>With regard to any unionized employees at the Closing Massachusetts Hospitals, the Debtors intend to provide appropriate notice and engage in effects bargaining with the relevant labor unions upon such union's request, as well as discuss shutdown plans with such unions.</p>
<p>Plan for Transfer/Discharge of Patients</p>	<p>The majority of current outpatients will complete their treatment prior to the closure date and, if necessary, provided with information and assistance to make follow-up appointments with replacement providers. Any patients who need longer treatment will be notified of the anticipated closure and will be transferred, along with their medical record information, to an outpatient clinic in the area or an outpatient clinic of their choice. The Debtors will complete the transfer or discharge of patients prior to closure.</p>
<p>Plan for Protection, Transfer and Storage of Medical Records</p>	<p>The Debtors intend to contract with a medical records custodian to ensure records are properly stored and patients can access their medical records after the closure. The Debtors will send written notification of how to locate patient records to all practitioners currently on the active staff of the respective hospitals. The transfer and discharge of all patients shall be conducted in a manner that ensures the protection of patient health, privacy, and safety.</p>
<p>Plan for the Disposition of Personal Property, Including Pharmaceuticals, Hazardous Materials and Medical Waste</p>	<p>The Debtors will manage and dispose of pharmaceuticals, hazardous materials, and medical waste in accordance with state and federal guidelines. Medications, radioactive materials, chemicals, medical waste, infectious materials and other hazardous materials will be identified, secured and inventoried, then destroyed, disposed of, returned to vendors, or transferred to other providers as appropriate. Each hospital has hired vendors to manage the disposal of medical waste and infectious materials. After termination of services, the Debtors will also retain an outside vendor to decontaminate hot rooms.</p>
<p>Communications Plan</p>	<p>The Debtors are developing a comprehensive approach to keep patients, employees, government agencies, area hospitals and the community at large informed of the closure. In particular, the Debtors intend to contact area hospitals and outpatient practices to inform them of the proposed closure and to discuss procedures for the transfer of patients. In addition, the Debtors will notify the fire department and the appropriate government agencies of the proposed closure. The Debtors will place public notices in local newspapers regarding the location of patient medical records, and provide written notice to all active physicians as to how to locate patient records.</p>

Schedule 1**Satellite Facilities**

Satellite Facility	Satellite Facility Address
Norwood Performance Therapy	1343 Providence Highway, Norwood, MA 02062
Norwood Hospital Cancer Care Center at Foxboro	70 Walnut Street, Foxborough, MA 02035
Foxboro	70 Walnut Street, Foxborough, MA 02035
Guild Imaging Center of Norwood Hospital	825 Washington Street, Suites 170 and 210, Norwood, MA 02062

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	§	Chapter 11
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STEWARD HEALTH CARE SYSTEM LLC, et al.,	§	Case No. 24-90213 (CML)
	§	
Debtors.¹	§	(Jointly Administered)
	§	
	§	

**ORDER (I) AUTHORIZING DEBTORS
TO (A) CLOSE NORWOOD HOSPITAL FACILITIES AND
(B) REJECT EXECUTORY CONTRACTS AND ABANDON PROPERTY
IN CONNECTION THEREWITH; AND (II) GRANTING RELATED RELIEF**

Pursuant to and in accordance with the *Order (I) Approving Procedures Related to Facility Closures on a Final Basis; and (II) Granting Related Relief* (Docket No. 2146) (the “**Facilities Closure Procedures Order**”)² entered in the above-captioned chapter 11 cases of Steward Health Care System LLC and its debtor affiliates (collectively, the “**Debtors**”); and the Debtors having properly filed with this Court and served on the Notice Parties a notice (the “**Facilities Closure Notice**”) of their intent to close the satellite facilities relating to Norwood Hospital (800 Washington St., Norwood, MA 02062) (the “**Closing Facilities**”)³ and abandon any personal property remaining at the Closing Facilities as of the proposed closure date for the Closing Facilities (the “**Facilities Closure Date**”), in accordance with the terms of the Facilities Closure

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Facilities Closure Procedures Order.

³ Norwood Hospital’s operations ceased prepetition. However, as of the date hereof, there are certain satellite facilities operating under the Norwood Hospital license, which will expire on November 5, 2024.

Procedures Order; and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice need be provided; and no timely objections having been filed to the Facilities Closure Notice; and the Court having found and determined that the relief requested is in the best interests of the Debtors, their respective estates, creditors, and all parties in interest; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Debtors are authorized to close the Closing Facilities in accordance with the Closure Plan set forth in the Facilities Closure Notice (the “**Facilities Closure**”). The Debtors are authorized to make amendments to the plans to close the Closing Facilities in consultation with the applicable regulators, the Creditors’ Committee, the ABL Lenders, the FILO Lenders, MPT, and Suzanne Koenig, the patient care ombudsman for the Closing Facilities, without further order from this Court.

2. Local, state, and federal regulators shall cooperate with the Debtors in good faith to effectuate each Facilities Closure, and the Debtors shall have no liability to any governmental entity for effectuating the Facilities Closure in accordance with the proposed closure plans approved by this Order, subject to applicable laws and regulations.

3. The Debtors reserve the right to reject contracts or leases pursuant to the *Order (I) Approving Procedures for Rejection of Executory Contracts and Unexpired Leases of Nonresidential Real Property; (II) Amendments to Certain Unexpired Leases of Nonresidential Real Property; (III) Abandonment of Property in Connection Therewith; and (IV) Granting Related Relief* (Docket No. 1551) or a separate motion approved by the Court.

4. Subject to the restrictions set forth in Paragraphs 3 and 4 of the Facilities Closure Procedures Order, any and all personal property remaining at the Closing Facilities as of the applicable Facilities Closure Date shall be deemed abandoned as of the Facilities Closure Date without further notice or order of the Court, free and clear of all liens, claims, interests, or other encumbrances. Any landlord or other designee shall be free to dispose of any such items without notice or liability to any party. The Debtors reserve the right to sell or abandon additional assets pursuant to the *Order (I) Establishing Procedures for Sales, Transfers, and Abandonment of De Minimis Assets; and (II) Granting Related Relief* (Docket No. 1665) or a separate motion approved by the Court. The right of any landlord, if any, to file a claim for the costs of disposal of such property is fully reserved, as is the right of all parties in interest to object to such claim.

5. Nothing contained in the Facilities Closure Procedures Order or this Order, nor any payment made pursuant to the authority granted by this Order, is intended to be or shall be deemed as (i) an implication or admission as to the validity of any claim against the Debtors, (ii) a waiver or limitation of the Debtors' or any party in interest's rights to dispute the amount of, basis for, or validity of any claim, (iii) a waiver of the Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable nonbankruptcy law, (iv) a waiver of the obligation of any party in interest to file a proof of claim, (v) an agreement or obligation to pay any claims, (vi) a waiver of any claims or causes of action which may exist against any creditor or interest holder, (vii) an admission as to the validity of any liens satisfied pursuant to the Facilities Closure Procedures Order or this Order, (viii) an approval, assumption, adoption, or rejection of any agreement, contract, lease, program, or policy under section 365 of the Bankruptcy Code, (ix) an implication or admission of consent, or modification or waiver of any rights, including consent rights, of any non-debtor party with respect to any sale transaction, (x) a waiver of any of the

Creditors' Committee's Challenge rights, as set forth in the Final DIP Orders, (xi) a waiver of any claims of the Debtors, (xii) a waiver of any WARN Act claim or any obligations, right or claim under any collective bargaining agreement or requirement under section 1113 of the Bankruptcy Code, or (xiii) a waiver of any defenses, rights, claims, or counterclaims of the Debtors (or any other party in interest) with respect to the foregoing. Likewise, if the Court grants the relief sought herein, any payment made pursuant to the Court's order is not intended to be and should not be construed as an admission to the validity of any claim or a waiver of the Debtors' or any other party in interest's rights to dispute such claim subsequently.

6. Notice of the Facilities Closure Notice is adequate under Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules.

7. Notwithstanding the provisions of Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

8. The Debtors are authorized to take all actions necessary or appropriate to carry out the relief granted in this Order.

9. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2024
Houston, Texas

Christopher Lopez
United States Bankruptcy Judge