



MONTGOMERY McCRACKEN

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October 14, 2025

VIA EMAIL to mnabulsi@mblawfirm.com
and US Mail

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Mandelbaum Barrett PC
3 Becker Farm Road
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Roseland, NJ 07068

**Re: CarePoint Health Systems Inc. d/b/a Just Health Foundation, et al.
United States Bankruptcy Court for the District of Delaware
Case No. 24-12534 (JKS)**

Dear Mr. Nabulsi:

As you may know, my firm represents the New Jersey Department of Health (“DOH”) in the above bankruptcy; this letter is addressed to you as counsel for (1) Bayonne Medical Center Opco, LLC (the “Lender” under the Exit Facility Credit and Security Agreement), (2) Hudson Health System MSO, LLC (“HHS”) (the “Manager” under the Amended and Restated Management Services Agreement, and thus the entity that manages Christ Opco and HUMC [both as defined in that Agreement]), and (3) Hudson Regional Hospitals, LLC (“HRH”) (the “Facilities Manager” of Christ Opco and HUMC Opco under the Hospital Facilities Management Services Agreement).

In that regard, significant financial shortfalls have just been reported to the DOH by Christ Opco – less than five months after the Effective Date of the Seventh Amended Combined Disclosure Statement and Chapter 11 Plan of Reorganization as Modified as of April 15, 2025 (“Plan”). Since the Lender, the Manager, and Facilities Manager made commitments and representations in connection with that Plan as to the financial stability and management of Christ Opco, this is to notify those entities that they must take immediate action to ensure that Christ Opco remains viable and able to provide health services (including funding Christ Opco).

In particular:

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A PENNSYLVANIA LIMITED LIABILITY PARTNERSHIP
MICHAEL J. FEKETE, NEW JERSEY RESPONSIBLE PARTNER

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October 14, 2025

Page 2

- The Plan at p. 89 represented that HRH would provide the funds necessary to consummate the Plan.
- The Plan at p. 72 represented that it was feasible based on HRH's funding and because the Reorganized Debtors will be well positioned "to successfully operate their businesses on a go-forward basis based upon ... substantial management and operational changes made by HRH ... to reduce expenses and increase revenue."
- The Plan provided for the Exit Financing Agreement with HRH (Plan Supplement Exhibit E).
- HRH represented to the Bankruptcy Court – in Joint Exhibit 9 and elsewhere – that at least \$27 million in new funds was being made available under that Exit Financing Agreement.
- With regard to the Exit Financing Agreement, HRH represented to the Court that the contemplated funding would reserve sufficient funds for HUMC and Christ Opco to pay six months of operating expenses, or about \$15 million (D.I. 884).
- Pursuant to that Amended and Restated Management Services Agreement, HHS is now responsible for successfully operating Christ Opco (and the other Reorganized Debtors) as the Plan provision cited above represented would be the case.

The DOH (and others) relied on these representations and commitments in connection with the Plan and did not object to confirmation. Indeed, at a critical point in the bankruptcy, DOH relied on HRH's representations to compromise its claim and then vote to accept the disclosure statement/plan as an impaired class of creditors, providing critical support for the Plan. This was done to ensure the continued availability of health services in Hudson County, which HRH represented would be the case if the Plan were confirmed. However, the DOH is now being told that, less than five months after the Effective Date of the Plan, Christ Opco faces a significant cash shortfall. This is completely inconsistent with the representations and commitments made by the Lender and the Managers, including but not limited to those above. HRH is now seeking State funding to offset a deficit at Christ Opco and advising that without State support Christ Opco will cease operations despite HRH's representations during the course of the bankruptcy that it would be maintaining a four hospital system (Hudson Regional Health) in Hudson County.

In light of their obligations, summarized herein, the Lender and Manager must immediately take the necessary steps and provide the necessary funding to ensure that Christ

Mohamed H. Nabulsi, Esq.

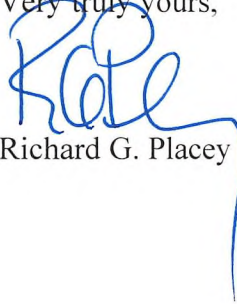
October 14, 2025

Page 3

Opco maintains existing health care services for this community in an appropriate and safe manner, including the funding of the four hospitals through intercorporate fund transfers and external financing.

As DOH is told by Christ Opco that the situation is urgent, please confirm before the close of business on Thursday October 16, 2025 that the Lender and Managers are taking the necessary steps and providing the necessary funding.

Very truly yours,

A handwritten signature in blue ink, appearing to read "R. Placey", with a long, sweeping vertical line extending downwards from the end of the signature.

Richard G. Placey

RGP:med

cc: Jeffrey A. Brown
Kimberly E. Jenkins
Robert Iannaccone