

# Exhibit 2

**Checklist of Objections****HCA**

<b>Objection</b>	<b>Response</b>
The Providers' release is not limited to the "identical factual predicate"	Blues' Brief at 8–10 Providers' Brief at 23–25 Slides 22 & 28
The Providers' release is ambiguous because it is not identical to the Subscribers' release	Blues' Brief (Doc. No. 3334) at 7 Providers' Brief (Doc. No. 3313-1) at 25–27, 28–30 Slides 23-27

**ER Groups**

<b>Objection</b>	<b>Response</b>
The procedures for opting out and submitting claims are unduly burdensome	Providers' Brief at 35 Slide 30
The release is too ambiguous to comply with the "identical factual predicate"	Blues' Brief at 6 Providers' Brief at 23–25 Slides 22 & 28
"Ordinary course of business" is not defined	Blues' Brief at 6 Providers' Brief at 27–28 Slide 31-32
The "caveat" to the "ordinary course of business" exception impermissibly expands the release	Blues' Brief at 8–10 Providers' Brief at 28–30 Slide 33
The release does not carve out common-law claims such as unjust enrichment and quantum meruit	Blues' Brief at 6–7 Providers' Brief at 29 Slide 34
The release could bind opt-outs whose affiliates did not opt out	Blues' Brief at 10–12 Providers' Brief at 30-32 Slide 35
The Plan of Distribution treats out-of-network emergency providers inequitably	Providers' Brief at 32-35 Slide 36

**Dr. Egner**

<b>Objection</b>	<b>Response</b>
The allocation of funds between facilities and professionals is inequitable	Providers' Brief at 35–37 Slide 19, 38
The requested administrative costs and attorneys' fees are disproportionately high	Providers' Brief at 37-39 Slide 42