

32. Instead of terminating the parties' agreements or otherwise allowing HNI to walk away, in August 2023, Steward's corporate representatives, including Laura Tortorella, the former Chief Operating Officer of Steward Health Care, participated in multiple phone calls regarding Steward's progress on making payments and its willingness to restructure contracts and staffing arrangements at the Hospitals once Steward caught up on overdue payments. HNI repeatedly tried to work with Steward's representatives, in good faith, to resolve the payment dispute. Joshua Putter, Steward's Regional President for Texas and Louisiana, participated in some of the calls between the parties. On August 22, 2023, Ms. Tortorella represented that Steward had issued a \$500,000.00 check to HNI several days earlier (on August 18, 2023).

33. On August 25, 2023, Ms. Tortorella represented that Steward had issued *another* \$500,000.00 check to HNI. Three days later, on August 28, 2023, HNI requested tracking

information for both checks that Steward had issued to HNI according to Ms. Tortorella. The next day, Ms. Tortorella forwarded HNI copies of two checks totaling approximately \$484,000.00—not \$1,000,000.00, as promised—with watermarks on both stating, "Not a Real Check." See Ex. 9, Email with Fake Checks. Ultimately, HNI did not receive the approximately \$484,000.00 payment until September 18, 2023, and never received the full payment promised by Steward's corporate representatives in August 2023.