Elizabeth K. Stepp Dr. Nick Oberheiden Lynette S. Byrd Oberheiden Law Group, PLLC 5710 LBJ Freeway, Suite 120 Dallas, Texas 75240 Phone: (214) 334-7648 Fax: (972) 559-3365 Attorneys for L2 Surgical, LLC

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

IN RE:	§ § Chapter 11
VICTORY MEDICAL CENER MID-CITIES,	§ § CASE NO. 15-42373
L.P., ET AL. ¹	§ § JOINT ADMINISTRATION PENDING 8

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NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES, AND DEMAND FOR SERVICE OF PAPERS

Creditor L2 Surgical, LLC, hereby submits this Notice of Appearance in the above-captioned case and requests notice of all hearings and conferences herein and makes demand for service of all papers herein, including, without limitation, all papers and notices pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010, and § 342 of the Bankruptcy Code. All notices given or required to be given in this case shall be served upon counsel for L2 Surgical, LLC, as follows:

¹ The Debtors in these cases are Victory Medical Center Mid-Cities, LP [Case No. 15-42373]; Victory Medical Center Mid-Cities GP, LLC [Case No. 15-42376]; Victory Medical Center Plano, LP [Case No. 15-42377]; Victory Medical Center Plano GP, LLC [Case No. 15-42378]; Victory Medical Center Craig Ranch, LP [Case No. 15- 42379]; Victory Medical Center Craig Ranch GP, LLC [Case No. 15- 42379]; Victory Medical Center Landmark, LP [Case No. 15-42382], Victory Medical Center Landmark GP, LLC [Case No. 15-42383]; and Victory Parent Company, LLC [Case No. 15-42384].

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This notice of appearance is not a waiver of any right to challenge the eligibility of the Debtor for relief under the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, any plan of reorganization or disclosure statement, any notice of fee applications, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleadings or request, whether transmitted or conveyed by mail, electronic delivery, hand delivery, telephone, facsimile, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court, or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above-referenced bankruptcy case and any adversary proceeding related thereto.

This Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of the rights of L2 Surgical, LLC (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have a district court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert or exercise any other rights, claims, actions, setoffs, or recoupments to which L2 Surgical, LLC, is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted,

<u>/s/ Elizabeth K. Stepp</u> Elizabeth K. Stepp TX State Bar. No. 00788467 E-mail: ekstepp@federal-lawyer.com Dr. Nick Oberheiden NY Reg. NO. 4619011 Email: nick@federal-lawyer.com Lynette S. Byrd TX State Bar No. 24047126 E-mail: lsb@federal-lawyer.com THE OBERHEIDEN LAW GROUP, PLLC 5710 LBJ Freeway, Suite 120 Dallas, Texas 75240 Telephone: (214) 334-7648 Fax: (972) 559-3365

ATTORNEYS FOR L2 SURGICAL, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2015, a true and correct copy of this notice was served on all counsel of record via e-service.

/s/ Elizabeth K. Stepp Elizabeth K. Stepp