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Counsel for the Adeptus Litigation Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ADPT DFW Holdings LLC, <i>et al.</i> ,	§	Case No. 17-31432
	§	
Debtors.	§	Jointly Administered under
	§	Case No. 17-31432

**DECLARATION THAT NO OBJECTION HAS BEEN RECEIVED
TO THE LITIGATION TRUST’S NINTH MOTION FOR AN ORDER
FURTHER EXTENDING THE DEADLINE TO OBJECT TO CLAIMS**

I, Shirley S. Cho, declare as follows:

1. I am an attorney at law, licensed to practice in the State of California and authorized to appear *pro hac vice* in this Court. I am a partner employed by the law firm of Pachulski Stang Ziehl & Jones LLP, counsel for the Adeptus Litigation Trust (the “Trust”). I have personal knowledge of the facts set forth herein and, if called as a witness, I would and could competently testify thereto.

2. I submit this declaration in support of the *Ninth Motion of the Adeptus Litigation Trust for an Order Further Extending the Deadline to Object to Claims* [Docket No. 1672] (the “Motion”), filed on August 25, 2021. By way of the Motion, the Trust seeks to

further extend the period within which the Trust may object to claims filed against the Debtors in the above-captioned cases for a period of one hundred-eighty (180) days from September 25, 2021 to and including March 24, 2022. Unless otherwise defined herein, capitalized terms have the meanings ascribed to them in the Motion.

3. On August 25, 2021, I caused our office to file and serve the Motion upon the Master Service List and parties that have requested notice pursuant to Bankruptcy Rule 2002. (*See Certificate of Service*, Docket No. 1673).

4. The undersigned counsel hereby certifies that, as of the date hereof, she has reviewed the docket in this case and no objections to the Motion have been filed, nor have any other informal responses been received.

5. Accordingly, the Trust requests entry of an order, a copy of which is attached hereto as **Exhibit A**, approving the Motion.

I declare under penalty of perjury under the laws of California and of the United States that the foregoing is true and correct of my own personal knowledge.

Executed this 16th day of September 2021, at Los Angeles, California.

/s/ Shirley S. Cho
Shirley S. Cho

EXHIBIT A

(Proposed Order)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
ADPT DFW Holdings LLC, <i>et al.</i> ,	§	Case No. 17-31432
Debtors.	§	Jointly Administered under
	§	Case No. 17-31432

**ORDER GRANTING NINTH MOTION OF THE ADEPTUS LITIGATION
TRUST FOR AN ORDER EXTENDING THE DEADLINE TO OBJECT TO CLAIMS**
[Relates to Docket No. 1672]

Upon consideration of the *Ninth Motion of the Adeptus Litigation Trust for an Order Extending the Deadline to Objection to Claims* (the “Motion”)¹ filed by the Adeptus Litigation Trust (the “Trust”) and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper in this Court pursuant

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

to 28 U.S.C. §§ 1408 and 1409; and it appearing that no other or further notice need be provided; and the Trust has shown good, sufficient and sound justification for the relief requested in the Motion and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; any objections to the requested relief having been withdrawn or overruled on the merits; and after due deliberation and sufficient cause appearing therefor, the Court hereby finds that the Motion should be granted as provided herein,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. The Current Claims Objection Deadline is extended to and including March 22, 2022.
3. This Order shall be without prejudice to the Trust's right to seek a further extension or extensions of the March 24, 2022 claims objection deadline.
4. This Court shall retain jurisdiction over any and all matters arising from the interpretation or implementation of this Order.

END OF ORDER