# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

GULF COAST HEALTH CARE, LLC, et. al.,

Debtors.<sup>1</sup>

Chapter 11

Case No. 21-11336 (KBO)

(Joint Administration Requested)

# NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PAPERS

PLEASE TAKE NOTICE that Weil, Gotshal & Manges LLP, Ferguson Braswell Fraser Kubasta PC, and Morris, Nichols, Arsht & Tunnell LLP hereby enter their appearance (the "Notice of Appearance") in the above-captioned case as counsel to OHI Asset Funding (DE), LLC², pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C §§ 101-1532 (as amended, the "Bankruptcy Code"), and rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (as amended, the "Bankruptcy Rules"), and request that copies of any and all notices and papers filed or entered in these cases be given to and served upon the following:

The last four digits of Gulf Coast Health Care, LLC's federal tax identification number are 9281. There are 62 Debtors in these chapter 11 cases, for which the Debtors have requested joint administration. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at https://dm.epiq11.com/GulfCoastHealthCare. The location of Gulf Coast Health Care, LLC's corporate headquarters and the Debtors' service address is 40 South Palafox Place, Suite 400, Pensacola, FL 32502.

In addition to OHI Asset Funding (DE), LLC, the above referenced counsel represent CSE Pine View LLC; Dixie White Nursing Home, LLC; Ocean Springs Nursing Home, LLC; Pensacola Real-Estate Holdings I, LLC; Pensacola Real-Estate Holdings III, LLC; Pensacola Real-Estate Holdings IV, LLC; Pensacola Real-Estate Holdings IV, LLC; Pensacola Real-Estate Holdings V, LLC; Skyler Boyington, LLC; Skyler Florida, LLC; Skyler Pensacola, LLC; Carnegie Gardens LLC; Greenbough, LLC; Marianna Holdings, LLC; Panama City Nursing Center LLC; Skyler Maitland LLC; Suwanee, LLC; OHI Asset (FL) Lake Placid, LLC; OHI Asset (FL) Pensacola – Hillview, LLC; OHI Asset (FL) Eustis, LLC; OHI Asset (FL) Pensacola, LLC; OHI Asset (FL) Melbourne, LLC; OHI Asset (FL) Pensacola – Nine Mile, LLC; OHI Asset (FL) Lake City, LLC.

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 3017(a), this request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, motion, proposed order, application, petition, pleading, request, complaint, demand, memorandum, affidavit, declaration, presentment, order to show cause, disclosure statement, and plan of reorganization, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile

transmission, electronically, or otherwise, that is filed or given in connection with these cases

and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance

nor any prior or later appearance, pleading, or claim waives (i) any right to have any matter or

proceeding for which a bankruptcy court lacks the authority to enter a final order or judgment

without the consent of the parties adjudicated by an Article III court, (ii) any right to trial by jury

in any proceeding so triable in these cases or any case, controversy, or proceeding related to

these cases, (iii) any right to have the District Court withdraw the reference in any matter subject

to mandatory or discretionary withdrawal, (iv) an election of remedies, or (v) any other

substantive or procedural right.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is without

prejudice to any other rights, claims, actions, defenses, setoffs, or recoupments under

agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs,

and recoupments against any entity either in these cases or in any other actions are expressly

reserved.

Dated: October 14, 2021

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Eric D. Schwartz

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