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

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In re:

Gulf Coast Health Care, LLC, et al.,

Debtor.

Chapter 11

Case No. 21-11336 (KBO)

(Jointly Administered)

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002

PLEASE TAKE NOTICE that Anthem Blue Cross and Blue Shield ("Anthem"), a party in interest in the above-captioned cases, hereby appears by its counsel, Morrison Cohen LLP ("Morrison"). Morrison hereby enters its appearance pursuant to section 1109(b) of title 11 of the United States Code ("Bankruptcy Code"), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure ("Bankruptcy Rules"), and rule 2002-1(d) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the "Local Rules") and requests that the undersigned be added to the official mailing matrix and service lists in these cases. Morrison requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these chapter 11 cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists,

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schedules, statements, chapter 11 plans, disclosure statements, and all other matters arising herein or in any related adversary proceeding, be given and served upon Anthem through service upon Morrison, at the addresses, telephone, and facsimile numbers set forth below:

> Joseph T. Moldovan, Esq. David J. Kozlowski, Esq. MORRISON COHEN LLP 909 Third Avenue New York, NY 10022 Telephone: (212) 735-8600 Facsimile: (212) 735-8708 Email: <u>bankruptcy@morrisoncohen.com</u> <u>dkozlowski@morrisoncohen.com</u>

**PLEASE TAKE FURTHER NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, complaint, or demand, motion, petition, pleading, or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted, or conveyed by mail, hand delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002 shall not be deemed or construed to be a waiver of any of the rights of Anthem, including, without limitation, to (i) have final orders in non-core matters entered only after *de novo* 

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review by a higher court, (ii) trial by jury in any proceeding so triable in these cases, or any case, controversy, or adversary proceeding related to these cases, (iii) have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Anthem may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: October 21, 2021

MORRISON COHEN LLP

<u>/s/ Joseph T. Moldovan</u>

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