

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

In re:

Gulf Coast Health Care, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 21-11336 (KBO)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby appears as counsel in the above-captioned case for and on behalf of Dialyze Direct LLC, for all purposes in connection with this case. The undersigned counsel hereby requests service of any and all notices given or required to be given in the above-captioned case, and all papers served or required to be served in the case, and requests that the name and address of the undersigned counsel be added to all mailing matrices in this case. Service may be made and directed as follows:

Kevin S. Mann, Esquire
CROSS & SIMON, LLC
1105 N. Market Street, Suite 901
Wilmington, Delaware 19801
Telephone: (302) 777-4200
kmann@crosslaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code, but also includes without limitation any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, email, electronic filing or otherwise filed or made with regard to the above-captioned case and proceedings therein, and for the purposes of CM/ECF.

This Notice of Appearance and Request for Service of Papers is without prejudice to Dialyze Direct LLC's rights, remedies, and claims against other entities or any objection that may be had to the subject-matter jurisdiction of the court, and shall not be deemed or construed to submit Dialyze Direct LLC to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation Dialyze Direct LLC's (i) right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) right to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) right to seek a change of venue, or (v) any other rights, claims, actions, setoffs or recoupments to which Dialyze Direct LLC is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Dialyze Direct LLC expressly reserves.

Dated: October 27, 2021

CROSS & SIMON, LLC

/s/ Kevin S. Mann

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