

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

In re:

GULF COAST HEALTH CARE, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 21-11336 (KBO)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), the undersigned counsel enter their appearance as counsel for Domenica Castellano, Virginia Tolbert, Shelley Tambling, Sadie Morris, McKenzie, Ethel McKenzie, James Kelly, Robert Einstein, Frances Irene Einstein, William Roberson, Stephen McCown, Gerald Hartman, Grace Hall, Rosa Fields, Wanda Booth, Yolen Ramon Bressan, Janie Clark, Alverda Dunn, Paul Eskew, Michael Gordon, James Thurman Johnson, Christobel Kirby, Patricia Miller, Henry Norman, Sandra Santiago, Barbara Schubert, Carmen Tollinchi, Dorothy Weber, Louis Kraus, Johnnie Lee Wright, Norvell Brown, Flora Brown, John Allen Perry, Jon-Faye Tinsley, Robert Wilsher and Jennie Elridge (“the Florida Plaintiffs”) and request that all notices and other papers filed or served in the above-captioned cases be served upon the following attorneys:

¹ 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, which cases are being jointly administered for procedural purposes only. 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’ claims and noticing agent at <https://dm.epiq11.com/GulfCoastHealthCare>. The location of Gulf Health Care, LLC’s corporate headquarters and the Debtors’ service address is 40 South Palafox Place, Suite 400, Pensacola, FL 32502.

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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, 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, electronic filing, facsimile, or otherwise filed or made with regard to the referenced case and proceedings herein.

PLEASE TAKE FURTHER NOTICE that filing of this *Notice of Appearance and Request for Notices* shall not be deemed or construed to constitute a waiver of any substantive or procedural right of the Florida Plaintiffs including, without limitation: (i) the right to have final orders in non-core matters entered only after *de novo* review by the United States District Court for the District of Delaware (the “District Court”), (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution

heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Florida Plaintiffs are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Florida Plaintiffs expressly state otherwise, the Florida Plaintiffs do not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

[Signature Page Follows]

Dated: November 22, 2021
Wilmington, Delaware

Respectfully submitted,

/s/ Christopher M. Samis

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