

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

In re:

PROMISE HEALTHCARE GROUP, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 18-12491 (CSS)

(Jointly Administered)

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

PLEASE TAKE NOTICE that the undersigned counsel hereby appear in the above-captioned case for and on behalf of Ally Bank (“Ally”), for all purposes in connection with this case. The undersigned counsel hereby request 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 request that the names and addresses of the undersigned counsel be added to all mailing matrices in this case. Service may be made and directed as follows:

¹ The Debtors in these Chapter 11 cases, together with the last four digits of each Debtor’s federal tax identification number, are as follows: HLP HealthCare, Inc. (8381), PH-ELA, Inc. (9180), Professional Rehabilitation Hospital, L.L.C. (5340), Promise Healthcare #2, Inc. (1913), Promise Healthcare Group, LLC (1895), Promise Healthcare Holdings, Inc. (2601), Bossier Land Acquisition Corp. (6644), HLP of Los Angeles, LLC (9102), HLP of Shreveport, Inc. (1708), HLP Properties at The Villages Holdings, LLC (0006), HLP Properties at the Villages, L.L.C. (1938), HLP Properties of Vidalia, LLC (4255), HLP Properties, Inc. (0068), Promise Healthcare of California, Inc. (9179), Promise Healthcare, Inc. (7953), Promise Hospital of Ascension, Inc. (9219), Promise Hospital of Baton Rouge, Inc. (8831), Promise Hospital of Dade, Inc. (7837), Promise Hospital of Dallas, Inc. (0240), Promise Hospital of East Los Angeles, L.P. (4671), Promise Hospital of Florida at The Villages, Inc. (2171), Promise Hospital of Louisiana, Inc. (4886), Promise Hospital of Lee, Inc. (8552), Promise Hospital of Overland Park, Inc. (5562), Promise Hospital of Phoenix, Inc. (1318), Promise Hospital of Salt Lake, Inc. (0659), Promise Hospital of Vicksburg, Inc. (2834), Promise Hospital of Wichita Falls, Inc. (4104), Promise Properties of Dade, Inc. (1592), Promise Properties of Lee, Inc. (9065), Promise Properties of Shreveport, LLC (9057), Promise Skilled Nursing Facility of Overland Park, Inc. (5752), Promise Skilled Nursing Facility of Wichita Falls, Inc. (1791), Quantum Health, Inc. (4298), Quantum Properties, L.P. (8203), St. Alexius Hospital Corporation #1 (2766), St. Alexius Properties, LLC (4610), Success Healthcare 1, LLC (6535), Success Healthcare 2, LLC (8861), Success Healthcare, LLC (1604), Vidalia Real Estate Partners, LLC (4947), LH Acquisition, LLC (2328), Promise Behavioral Health Hospital of Shreveport, Inc. (1823), Promise Rejuvenation Centers, Inc. (7301), Promise Rejuvenation Center at the Villages, Inc. (7529), and PHG Technology Development and Services Company, Inc. (7766). The mailing address for the Debtors, solely for purposes of notices and communications, is 999 Yamato Road, 3rd FL, Boca Raton, FL 33431.

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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 Ally'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 Ally to the jurisdiction of the Court. All rights, remedies, and claims are hereby expressly reserved, including without limitation Ally'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 Ally is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Ally expressly reserves.

Dated: November 19, 2018
Wilmington, Delaware

CROSS & SIMON, LLC

/s/ Joseph Grey

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- and -

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