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Dmitriy Cherepinskiy, Esq. (CA Bar No. 222311)

(Admitted *Pro Hac Vice*)

Counsel for Creditors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
)	
PIPELINE HEALTH SYSTEM, LLC., <i>et al.</i> , ¹)	Case No. 22-90291 (MI)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF WITHDRAWAL OF PADILLA CREDITORS' MOTION FOR RELIEF
FROM THE AUTOMATIC STAY AND ASSOCIATED FILINGS**

PLEASE TAKE NOTICE that Creditors and parties in interest in the above-referenced bankruptcy case, Martha Padilla, Gabriela Alcala-Jeronimo, Diana Alcala, and Mario Alcala, Jr., individually and as successors-in-interest to Mario Gustavo Alcala Ramirez (collectively, the "Padilla Creditors"), by and through their counsel, Cherepinskiy Law Firm, P.C., do hereby withdraw each of the following filed papers related to Padilla Creditors' Motion for Relief from the Automatic Stay, without prejudice, which have been consensually resolved with the Debtors:

- (i) *Padilla Creditors' Motion for Relief from the Automatic Stay* [Docket No. 495], without prejudice;
- (ii) *[Proposed] Order Granting Padilla Creditors' Motion for Relief from the Automatic Stay* [Docket No. 496], without prejudice; and

¹ A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at <http://dm.epiq11.com/PipelineHealth>. The Debtors' service address is 898 N. Pacific Coast Highway, Suite 700, El Segundo, California 90245.

- (iii) *Padilla Creditors' Response (Reply) to Debtors' Objection to Motion for Relief From the Automatic Stay* [Docket No. 675], without prejudice.

Dated: January 12, 2023.

Respectfully submitted,

CHEREPINSKIY LAW FIRM, P.C.

/s/ Dmitriy Cherepinskiy

Dmitriy Cherepinskiy, Esq.

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**Attorneys for Martha Padilla, Gabriela
Alcala-Jeronimo, Diana Alcala, and
Mario Alcala, Jr., individually and as
successors-in-interest to Mario
Gustavo Alcala Ramirez, Creditors**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Notice of Withdrawal of Padilla Creditors' Motion for Relief from the Automatic Stay and Associated Filings was electronically filed on this 12th day of January 2023, and served *via CM/ECF (PACER)* on all parties requesting electronic notification in this case. Additionally, this Notice of Withdrawal of Certain Filings of Padilla Creditors was electronically (by e-mail) served upon the parties listed on the attached service list.

/s/ Dmitriy Cherepinskiy

Dmitriy Cherepinskiy

Service List
Re: Pipeline Health System, LLC, et al.
Case No. 22-90291 (MI)

<p>JACKSON WALKER LLP Matthew D. Cavanaugh (TX Bar No. 24062656) Kristhy M. Peguero (TX Bar No. 24102776) Veronica A. Polnick (TX Bar No. 24079148) Javier Gonzalez (TX Bar No. 24119697) 1401 McKinney Street, Suite 1900 Houston, Texas 77010 Telephone: (713) 752-4200 Facsimile: (713) 752-4221 Email: mcavanaugh@jw.com Email: kpeguero@jw.com Email: vpolnick@jw.com Email: jgonzalez@jw.com <i>Co-Counsel to the Debtors and Debtors in Possession</i></p>	<p>KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP Steven N. Serajeddini, P.C. (admitted <i>pro hac vice</i>) Zachary R. Manning (admitted <i>pro hac vice</i>) 601 Lexington Avenue New York, New York 10022 Telephone: (212) 446-4800 Facsimile: (212) 446-4900 Email: steven.serajeddini@kirkland.com Email: zach.manning@kirkland.com <i>Co-Counsel to the Debtors and Debtors in Possession</i></p>
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