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Attorneys for Wholesale Floors, LLC

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

In re:

LEGACY CARES, INC.,

Debtor.

Chapter 11

Case No. 2:23-bk-02832-DPC

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICE**

TO: Clerk of the U.S. Bankruptcy Court, Debtor, Debtor's attorney of record and all parties-in-interest:

PLEASE TAKE NOTICE that creditor Wholesale Floors, LLC ("Wholesale Floors") hereby enters its appearance through counsel, Bradley D. Pack of Engelman Berger, P.C., in accordance with Federal Rules of Bankruptcy Procedure 9010, and pursuant to 11 U.S.C. § 102(1) and 342 and Federal Rules of Bankruptcy Procedure 2002 and 9007, and requests that all notices given or required to be given in this matter and all papers served or required to be served in this matter also be given to and served upon the following:

Bradley D. Pack
ENGELMAN BERGER, P.C.
2800 North Central Avenue, Suite 1200
Phoenix, Arizona 85004
bdp@eblawyers.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notice and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any plan and disclosure statement, orders and notice of any application,

1 motion, petition, pleading, request, complaint, disclosure document of any kind, conference,
2 hearing or demand, whether formal or informal, whether written or oral, and whether
3 transmitted or conveyed by mail, courier service, telephone, facsimile transmission, telegraph,
4 telex or otherwise, which affect or seek to affect in any way any rights or interest of the above
5 referenced creditor.

6 This Notice of Appearance and Request for Service of papers shall not be deemed or
7 construed to be a waiver of the rights of the creditors: (i) to have final orders in non-core
8 matters or “*Stern* claims” entered only after de novo review by a District Court Judge; (ii) to
9 trial by jury in any proceeding so triable in this matter or any case, controversy, or proceeding
10 related to this matter; (iii) to have the District Court withdraw the reference in any matters
11 subject to mandatory or discretionary withdrawal; or (iv) with respect to any other rights,
12 claims, actions, setoffs, or recoupments to which the creditors may be entitled, in law or in
13 equity, all of which are expressly reserved.

14 **DATED** this 19th day of May, 2023.

15 **ENGELMAN BERGER, P.C.**

16 By /s/ Bradley D. Pack – SBA #023973

17 Bradley D. Pack
Attorneys for Wholesale Floors, LLC

18 **COPY** of the foregoing e-mailed
19 this 19th day of May, 2023 to:

20 Robert H. McKirgan
Email: rmckirgan@pswmlaw.com
21 J. Henk Taylor
Email: htaylor@warnerangle.com
22 Attorneys for Debtor

23 Jennifer A. Giaimo
Email: Jennifer.A.Giaimo@usdoj.gov
24 Chapter 11 Trustee

25 Jordan A Kroop
Email: jkroop@pszjlaw.com
26 Attorneys for Official Committee of
Unsecured Creditors
27

COPY of the foregoing automatically
served via the Court's ECF System
this 19th day of May, 2023 to:
All attorneys that have entered appearances

/s/ Cynthia D. Nesselrode