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

In re:

WELLPATH HOLDINGS, INC., et al¹,

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure, the undersigned hereby appears in the above-captioned chapter 11 proceedings as counsel on behalf of JDY Inc. and requests that all notices given or required to be given in these proceedings, including, but not limited to, all orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, and whether transmitted or conveyed by mail, electronic mail, ECF notice, hand delivery, telephone or otherwise, which affect JDY Inc. or these chapter 11 proceedings to be served upon:

> Rebecca L. Matthews (Texas Bar No. 24062776) **FROST BROWN TODD LLP** 2101 Cedar Springs Rd. Dallas, Texas 75201 Tel: (214) 580-5852 Fax: (214) 545-3472 E-mail: rmatthews@fbtlaw.com

PLEASE TAKE FURTHER NOTICE that this entry of appearance is not intended as nor is it a consent to jurisdiction of the Bankruptcy Court over JDY Inc., specifically but not limited to (i) its right to have final orders in non-core matters entered only after *de novo* review by a district judge, (ii) its right to a trial by jury in any proceeding triable herein, or in any case,

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://dm.epiq11.com/Wellpath. The Debtors' service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

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controversy or proceeding related hereto, (iii) its right to have the reference withdrawn by the District Court in any matter subject to mandatory, or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which JDY Inc. is or may be entitled to under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments JDY Inc. expressly reserves.

Date: December 9, 2024

Respectfully submitted,

FROST BROWN TODD LLP

By: /s/ Rebecca L. Matthews Rebecca L. Matthews (Texas Bar No. 24062776) 2101 Cedar Springs Rd. Dallas, Texas 75201 Tel: (214) 580-5852 Fax: (214) 545-3472 E-mail: rmatthews@fbtlaw.com

COUNSEL FOR JDY INC., N.A.

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CERTIFICATE OF SERVICE

I hereby certify that on December 9, 2024, a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* was sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Rebecca L. Matthews Rebecca L. Matthews

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