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United States of America

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:

Senior Care Centers, LLC, *et. al.*,

Debtors.

Chapter 11

Case No. 18-33967 (BJH)

Jointly Administered

Senior Care Centers, LLC, a Delaware limited liability company, and PM Management – Frisco NC, LLC dba Victoria Gardens of Frisco, a Texas limited liability company,

Debtors/Plaintiffs,

v.

Alex M. Azar II, in his official capacity as Secretary, United States Department of Health and Human Services; and Seema Verma, in her official capacity as Administrator, Centers for Medicare and Medicaid Services,

Defendants.

Adv. No. 19-03240 (BJH)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

Please take notice that Tiffiney Carney is appearing on behalf of the Defendant, the United States of America, in the above-styled and numbered adversary proceeding.

Pursuant to Bankruptcy Rules that include 2002, 3017(a), and 9010(b) and N.D. Tex. L.B.R. 2002-1(j) all notices given or required to be given to the Defendant and all papers served or required to be served on the Defendant in this case are requested to be served on the following counsel:

Tiffiney F. Carney (D.C. Bar No. 1024568)
U.S. Department of Justice
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Fax: (202)-514-9163
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P.O. Box 875
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1100 L Street, NW
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Please take further notice that neither this notice nor any later appearance, pleading, proof of claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to these cases, (iii) the right to have the United States District Court for the Northern District of Texas withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Court for any purpose other than with respect to this Notice, (v) any election of remedy, and (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses setoffs and recoupments are expressly reserved.

DATED December 20, 2019.

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

ERIN NEALY COX
United States Attorney

/s/ Leah V. Lerman

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ATTORNEYS FOR THE UNITED STATES

Certificate of Service

On December 20, 2019, I electronically submitted the foregoing document with the clerk of court for the U.S. Bankruptcy Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Leah V. Lerman
Leah V. Lerman
Trial Attorney