

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION

IN RE:

CASE NO.: 16-50740

PROGRESSIVE ACUTE CARE, LLC, et al.,

CHAPTER 11

Debtors.

JOINTLY ADMINISTERED

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**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICES AND PLEADINGS**

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**TO THE CLERK OF THE COURT AND ALL PARTIES IN INTEREST PLEASE  
TAKE NOTICE THAT:**

KEAN MILLER LLP and SILLS CUMMIS & GROSS P.C. have been selected as proposed co-counsel for the Official Committee of Unsecured Creditors (the “Committee”) in the above-referenced, jointly administered cases. Formal employment applications and pro hac vice applications will be filed shortly.

**PLEASE TAKE FURTHER NOTICE** that KEAN MILLER LLP and SILLS CUMMIS & GROSS P.C. hereby appear in the above-captioned cases pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as proposed co-counsel for the Committee and the Committee demands, pursuant to Bankruptcy Rules 2002, 9007 and 9010(b) and sections 102(1), 342 and 1109(b) of title 11 of the United States Code, (i) that all notices given or required to be given in these case and all papers served or required to be served in these cases be given to and served upon the following attorneys, at the addresses set forth below and (ii) that the following

attorneys be added to the mailing matrix on file with the Clerk of the Bankruptcy Court and any claims and noticing agent as set forth below:

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**FURTHER NOTICE** is hereby given that the foregoing request includes all notices and copies of all motions, notices, reports, briefs, applications, complaints, demands, hearings, pleadings, adversary proceedings, proposed orders, confirmed copies of orders, any proposed disclosure statement or plan of reorganization, or request, formal or informal, whether transmitted or conveyed by mail, email, fax or otherwise that has been filed with the court, any other documents or instruments filed in the above-referenced proceedings and any other matter in which notice is required pursuant to 11 U.S.C. § 1109(b) and Bankruptcy Rules 2002(a) and (b), 3017(a), and 9013 of the Federal Rules of Bankruptcy Procedure.

**FURTHER NOTICE** is hereby given that this Notice of Appearance and any later appearance, pleading, claim or suit shall not be deemed to be a waiver of the rights of the Committee (1) to have final orders in matters and proceedings in which a Bankruptcy Court does not have the power to enter a final order under Article III of the Constitution entered only after *de novo* review by a District Court Judge, (2) to trial by

jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to any rights, actions, or defenses relating to the scope of the Bankruptcy Court's jurisdiction, or (5) to any other rights, claims, actions, defenses, setoffs, or recoupments to which the Committee is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Committee expressly reserves. Nor shall this Notice of Appearance be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: June 22, 2016

Respectfully submitted:

KEAN MILLER LLP

/s/ L. Eric Lockridge

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***Proposed Co-Counsel for the Official  
Committee of Unsecured Creditors***

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**CERTIFICATE OF SERVICE**

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I hereby certify that on June 22, 2016, a copy of the foregoing **NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PLEADINGS** was served through the court's ECF System on the Office of the U.S. Trustee, the Debtors through their attorneys, and on all other parties or creditors who are entitled to notice.

/s/J. Eric Lockridge