

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

IN RE:	*	CASE NO. 16-50740
	*	
PROGRESSIVE ACUTE CARE, LLC, et al.	*	CHAPTER 11
	*	
DEBTORS	*	JUDGE ROBERT SUMMERHAYS
	*	
	*	JOINTLY ADMINISTERED
	*	

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that, pursuant to §§ 102 and 1109(b) of the United States Bankruptcy Code and Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned requests that copies of all notices (given or required to be given in these jointly-administered bankruptcy cases) and copies of all papers (served or required to be served in these jointly-administered bankruptcy cases) be provided to and served upon the following counsel on behalf of **The Schumacher Group of Louisiana, Inc., Iberia Physician Services, LLC, Iberia Emergency Group, LLC, Avoyelles Emergency Group, LLC, Winn Emergency Group, LLC and Allen Emergency Group, LLC** (collectively “The Schumacher Group”):

Joseph P. Hebert
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¹ Please note that the Lafayette, Louisiana street address and post office address have different zip codes.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes without limitation the notices and papers referred to in Rule 2002 of the Federal Rules of Bankruptcy Procedure and also includes without limitation any plan of reorganization or liquidation and objections thereto, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these jointly-administered bankruptcy cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, electronic transmission, facsimile or otherwise.

PLEASE TAKE FURTHER NOTICE that The Schumacher Group intends that neither this notice of appearance, nor any later appearance, pleading, claim or suit, shall waive, or be deemed or construed as a waiver of, (1) The Schumacher Group's right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge, (2) The Schumacher Group's right to trial by jury in any proceeding in these jointly-administered cases or any action, controversy or proceeding related to these jointly-administered cases, (3) The Schumacher Group's right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which The Schumacher Group is or may be entitled under agreement, in law or in equity, all such rights and recoupments being expressly reserved by The Schumacher Group.

Filed this 8th day of July, 2016.

By: /s/ Joseph P. Hebert

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LLC, Iberia Emergency Group, LLC,
Avoyelles Emergency Group, LLC, Winn
Emergency Group, LLC and Allen
Emergency Group, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing *Notice Of Appearance And Request For Notice* has been filed electronically with the Clerk of Court using the CM/ECF system and notice of this filing has been sent to the following parties or counsel of record who have registered to receive electronic service:

- Bradley L. Drell (bdrell@goldweems.com);
- George C. Freeman, III (gfreeman@barrassousdin.com);
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- Richard J. Reynolds (rreynolds@ahmgt.com);
- Ronald J. Savoie (ronnie@jlaw.net);
- Mark P. Seyler (mseylor@barkleythompson.com);
- Catherine Noel Steffes (nsteffes@steffeslaw.com);
- William E. Steffes (bsteffes@steffeslaw.com);
- Office of U.S. Trustee (USTPRegion05.SH.ECF@usdoj.gov);
- Alan H. Goodman (alan.goodman@bswllp.com);
- Thomas J. Cortazzo (tcortazzo@bhbmlaw.com);

And to the following via United States First Class Mail, postage prepaid and properly addressed:

Progressive Acute Care, LLC
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Stephen D. Wheelis
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P.O. Box 13199
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Lafayette, Louisiana, this 8th day of July, 2016.

/s/Joseph P. Hebert

JOSEPH P. HEBERT