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6 Attorneys for creditors California Physicians' Service  
7 dba Blue Shield of California and Blue Shield of  
California Promise Health Plan

8 UNITED STATES BANKRUPTCY COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA  
10

11 In re:

12 BORREGO COMMUNITY HEALTH  
13 FOUNDATION,

14 Debtor and Debtor In  
15 Possession.

Case No. 22-bk-02384-11

Chapter 11

**NOTICE OF APPEARANCE AND  
REQUEST FOR NOTICE**

16 **PLEASE TAKE NOTICE** that California Physicians Service dba Blue Shield of  
17 California and Blue Shield of California Promise Health Plan (together "Blue Shield"), by and  
18 through its attorneys, Snell & Wilmer L.L.P., hereby requests notices of all hearings, trial dates,  
19 motions and notices of motions, applications for compromise, applications to abandon properties,  
20 applications for approval to sell property of the estate or to pay expenses or claims, copies of  
21 operating reports, copies of statements of deposits, returns of sale of real or personal property for  
22 court approval, whether such notice, application, motion or the like is sent by the court, the debtor,  
23 or any other party in interest in this case, and requests that all notices, applications, or the like be  
24 sent to the address below and that such address be added to the court's master mailing list:  
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8 THIS ENTRY OF APPEARANCE AND REQUEST FOR NOTICE is without prejudice  
9 to Blue Shield's rights, remedies and claims against other entities or any objection that may be  
10 made to the jurisdiction or venue of the court or venue of this case, and shall not be deemed or  
11 construed to be a waiver of Blue Shield's rights (1) to have final orders in noncore matters  
12 entered only after de novo review by a District Court Judge, (2) to trial by jury in any proceeding  
13 so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the  
14 District Court withdraw the reference in any matter subject to mandatory or discretionary  
15 withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which Blue Shield  
16 is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and  
17 recoupments Blue Shield hereby expressly reserves.

18 Dated: September 27, 2022

SNELL & WILMER L.L.P.

19 By: /s/ Michael B. Reynolds

20 Michael B. Reynolds  
21 Andrew B. Still

22 Attorneys for Creditors  
23 California Physicians Service dba Blue Shield  
24 of California and Blue Shield of California  
25 Promise Health Plan  
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