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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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THIS ENTRY OF APPEARANCE AND REQUEST FOR NOTICE is without prejudice to Blue Shield's rights, remedies and claims against other entities or any objection that may be made to the jurisdiction or venue of the court or venue of this case, and shall not be deemed or construed to be a waiver of Blue Shield's rights (1) to have final orders in noncore matters 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, or (4) any other rights, claims, actions, setoffs, or recoupments to which Blue Shield is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Blue Shield hereby expressly reserves.

Dated: September 27, 2022

SNELL & WILMER L.L.P.

By: /s/ Andrew B. Still
Michael B. Reynolds
Andrew B. Still

Attorneys for Creditors
California Physicians Service dba Blue Shield
of California and Blue Shield of California
Promise Health Plan