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PROPOSED COUNSEL FOR THE DEBTOR

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

In re:

MAYFLOWER COMMUNITIES, INC.¹

Debtor.

§
§
§
§

CHAPTER 11

CASE NO. 19-30283 (HDH)

**NOTICE OF COMMENCEMENT OF CHAPTER 11 CASE
AND FILING OF CERTAIN FIRST DAY MOTIONS**

PLEASE TAKE NOTICE that, on January 30, 2019, the above-captioned debtor and debtor in possession (the “Debtor”), filed a voluntary petition for relief (the “Chapter 11 Case”) under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Texas (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE, that a hearing (the “First Day Hearing”) will be held before the Honorable Judge Harlin DeWayne Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom 3, Dallas, Texas 75242-1496 on **February 1, 2019 at 10:00 a.m. (CST)**, or at such other time as the court may

¹ The last four digits of the Debtor’s federal tax identification number is 6350.

determine, on the following motions and supporting documents requesting certain “first day” relief (collectively, the “First Day Motions”), which were filed by the Debtor in connection with the above-captioned Chapter 11 Case:

1. Notice of Designation as Complex Chapter 11 Bankruptcy Case [Docket No. 2];
2. Motion of the Debtor for Entry of An Order Extending the Deadline to File Schedules of Assets and Liabilities and Statements of Financial Affairs [Docket No. 3];
3. Application For Entry of an Order Appointing Donlin, Recano & Company, Inc. as Claims and Noticing Agent Pursuant to 28 U.S.C. § 156(c), Effective as of the Petition Date [Docket No. 4];
4. Motion of the Debtor for Entry of Interim and Final Orders Authorizing the Debtor to (I) Maintain, Administer and Modify Its Refund Programs and Practices in Connection With Overpayment of Healthcare Services, and (II) Honor Obligations Related Thereto [Docket No. 8];
5. Motion of the Debtor for Interim and Final Orders Authorizing (I) the Debtor to Pay Prepetition Salaries, Wages, and Compensation, (II) the Continuation of Employee Benefit Programs and (III) Directing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations [Docket No. 9];
6. Motion of the Debtor for Entry of Interim and Final Orders Authorizing the Debtor to Pay Certain Prepetition Taxes [Docket No. 10];
7. Motion of the Debtor For Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Policies and Pay All Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies, and (II) Granting Certain Related Relief [Docket No. 12];

8. Motion of the Debtor for Entry of Interim and Final Orders Authorizing (I) Continued Use of Existing Cash Management System, (II) Maintenance of Existing Bank Accounts, (III) Continued Use of Existing Business Forms, and (IV) an Extension of Time to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements [Docket No. 6];

9. Motion of Debtor for Order Authorizing the Debtor to Escrow Certain Entrance Fees and Refund Certain Entrance Fees [Docket No. 7];

10. Motion of the Debtor for Entry of an Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Patient Information [Docket No. 5];

11. Motion of Debtor for an Order Authorizing the Use of the Debtor's Cash [to be filed]; and

12. Motion of The Debtor for Entry of Interim and Final Orders (I) Prohibiting Utilities From Altering, Refusing or Discontinuing Service, (II) Deeming the Utility Companies Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance [Docket No. 11].²

Copies of the above-referenced First Day Motions and the *Declaration of Louis E. Robichaux IV In Support Of Chapter 11 Petition and First Day Pleadings* [to be filed] may be (i) inspected in the offices of the Clerk of the Bankruptcy Court during normal business hours; (ii) downloaded from the Bankruptcy Court's web site at <http://www.txnb.uscourts.gov/> (please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents); and (iii) downloaded free of charge from the website of Donlin, Recano & Company, Inc., the Debtor's proposed claims and noticing agent, <https://www.donlinrecano.com/mayflower>. Requests for copies of the First Day Motions and

² This motion will not be heard at the First Day Hearing. A separate notice of hearing will be filed.

further information regarding the First Day Hearing may also be made to proposed counsel for the Debtor using the contact information below.

Dated: January 31, 2019
Dallas, Texas

DLA PIPER LLP (US)

By: /s/ Andrew Zollinger

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