

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**Wordsworth Academy,
Debtor.**

Chapter 11

Case No. 17-14463-amc

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Duane Morris LLP hereby appears in the above-referenced chapter 11 case as counsel for **Public Health Management Corporation** and pursuant to the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), including Bankruptcy Rules 2002, 3017, 9007 and 9010 and § 1109(b) of the Bankruptcy Code, request that copies of all notices and pleadings given or filed in this case be given and served upon the following:

James J. Holman, Esquire
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215-979-1530
Facsimile: 215-689-2562
Email: JJHolman@duanemorris.com

Michael R. Lastowski, Esquire
DUANE MORRIS LLP
222 Delaware Avenue, Suite 1600
Wilmington, DE 19801
Telephone: 302-657-4942
Facsimile: 302-397-2138
E-mail: MLastowski@duanemorris.com

PLEASE TAKE FURTHER NOTICE that, pursuant to § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and/or the rights of the **Public Health Management Corporation**.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed, to be a waiver of any of the rights of the **Public Health Management Corporation**, including, without limitation (i) the right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the **Public Health Management Corporation** is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

FURTHER, if any limited service lists are used in this proceeding, the undersigned requests inclusion thereon.

Respectfully submitted,

Dated: July 6, 2017

/s/ James J. Holman.
James J. Holman, Esquire (PA 56468)
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215-979-1530
Facsimile: 215-689-2562
Email: JJHolman@duanemorris.com

Michael R. Lastowski, Esquire
DUANE MORRIS LLP
222 Delaware Avenue, Suite 1600
Wilmington, DE 19801
Telephone: 302-657-4942
Facsimile: 302-397-2138
E-mail: MLastowski@duanemorris.com

Counsel for Public Health Management Corporation

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

**Wordsworth Academy,
Debtor.**

Chapter 11

Case No. 17-14463-amc

CERTIFICATE OF SERVICE

I, James J. Holman, certify that I am not less than 18 years of age, and that on the date set forth below, that the foregoing **Notice of Appearance and Request For Service of Notices And Papers** was filed through the Court's electronic document filing system and was served by the Court via notice of electronic filing and hyperlink to the document on all parties who are registered to receive electronic service in these cases.

Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: July 6, 2017

/s/ James J. Holman.
James J. Holman, Esquire (PA 56468)
DUANE MORRIS LLP
30 South 17th Street
Philadelphia, PA 19103-4196
Telephone: 215-979-1530
Facsimile: 215-689-2562
Email: JJHolman@duanemorris.com

Counsel for Public Health Management Corporation