IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	Chapter 11
	§	
ABC DENTISTRY, P.A., et al.	§	Case No. 16-34221
	§	
DEBTORS	§	Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

Please take notice that the following counsel hereby appear for Saeed Rohi, DDS as partyin-interest and hereby request that any and all notices given or required to be served in this case be served on:

> Timothy L. Wentworth CAGE, HILL & NIEHAUS, L.L.P. 5851 San Felipe, Suite 950 Houston, Texas 77057 Telephone: (713) 789-0500 Facsimile: (713)974-0344

Please take further notice that this request includes, without limitation, notices of any orders, motions, demands, complaints, petitions, pleadings or requests, applications and any other documents brought before the Court in this case, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, email, facsimile, or otherwise that (i) affects or seeks to affect in any manner any right or interest of any creditor or party-in-interest in this case, including Saeed Rohi, DDS with respect to (a) the Debtors; (b) any property of the Debtor's estates or (c) any property or proceeds in the possession, custody or control of others that the Debtors may seek to expend or otherwise use; or (ii) requires or seeks to require any act, delivery of any property, payment or other conduct by or from Saeed Rohi, DDS.

Case 16-34221 Document 64 Filed in TXSB on 09/15/16 Page 2 of 2

Please take further notice that Saeed Rohi, DDS intends that neither this Notice of Appearance nor any prior or later appearance, pleading, claim or suit shall waive: (i) any right of Saeed Rohi, DDS to have any final order in a noncore matter entered only after *de novo* review by a district judge, (ii) any right of Saeed Rohi, DDS to trial by jury in this case or any case, controversy or proceeding related to this case; (iii) any right of Saeed Rohi, DDS to have the district court withdraw the reference in any matter subject to mandatory or discretional withdrawal; or (iv) any other right, claim, action, defense, setoff, or recoupment to which Saeed Rohi, DDS is or may be entitled under any agreement, in law, in equity, or otherwise.

Respectfully submitted,

/s/ Timothy L. Wentworth Timothy L. Wentworth State Bar No. 21179000 OF COUNSEL: CAGE, HILL & NIEHAUS, L.L.P. 5851 San Felipe, Suite 950 Houston, Texas 77057 Telephone: (713) 789-0500 Facsimile: (713) 974-0344

ATTORNEYS FOR SAEED ROHI, DDS

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2016, a true and correct copy of the foregoing instrument was served on all parties who receive electronic notice.

<u>*Timothy L. Wentworth*</u> Timothy L. Wentworth