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

IN RE:	§	
ABC DENTISTRY, P.A., et al., 1	§ CHAPTER 11	
DEBTORS.	§ CASE NO. 16-34221	
DEDIOKS.		
	<b>§</b> Joint Administration Re	quested
	§	
SAEED ROHI, DDS, ex rel. STATE OF	§	
TEXAS,	§	
	§ §	
PLAINTIFF,	§	
<b>v.</b>	<b>§</b> ADV. PRO	
	§	
IRAJ S. JABBARY, DDS; KAUSER	§	
RUBINA BARI, DDS; ABC DENTISTRY	§	
PASADENA, PA; ABC DENTISTRY	§	
WEST OREM, PLLC; ABC DENTISTRY	§	
OLD SPANISH TRAIL, PLLC; ABC	§	
DENTISTRY HILLCROFT, PLLC, ABC	§	
DENTISTRY ROSENBERG, PLLC; ABC		
DENTISTRY, PA,	§ § §	
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DEFENDANTS.	U	

## **NOTICE OF REMOVAL**

1. Defendants ABC Dentistry, P.A.; ABC Dentistry West Orem, P.L.L.C.; and ABC Dentistry Old Spanish Trail, P.L.L.C. (collectively, the "Debtors") file this Notice of Removal from the 281st District Court of Harris County, Texas, to this Court pursuant to 28 U.S.C. § 1452(a), Federal Rule of Bankruptcy Procedure 9027, and Local Rule of Bankruptcy Procedure 9027-1.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases are: ABC Dentistry, P.A.; ABC Dentistry West Orem, P.L.L.C.; and ABC Dentistry Old Spanish Trail, P.L.L.C.

2. A detailed description of the Debtors' businesses and the events leading to these

chapter 11 cases is fully set forth in the Debtors' motions for joint administration filed on August

26, 2016 in the Debtors' bankruptcy cases, and is incorporated herein by reference.

3. This Court has jurisdiction over the Removed Action under 28 U.S.C. §§ 157 and

1334(b). This matter is a core proceeding under 28 U.S.C. § 157(b), and accordingly, this Court

has the authority to hear and determine the Removed Action.

4. Alternatively, the Court has jurisdiction over one or more of the causes of action

in the Removed Action pursuant to its "related to" jurisdiction under 28 U.S.C. §§ 157 and

1334(b) and has the authority to hear the Removed Action under 28 U.S.C. § 157(c).

5. To the extent the Court determines that any of the causes of action in the

Removed Action are non-core proceedings, the Debtors consent to entry of final orders or

judgment by this Court.

6. In accordance with Federal Rule of Bankruptcy Procedure 9027(a)(1) and Local

Rule of Bankruptcy Procedure 9027-1, the following are attached as exhibits:

Exhibit A: Docket Sheet in the State Court Action

Exhibit B: Petitions and Answers in the State Court Action

Exhibit C: Court Orders in the State Court Action

Exhibit D: Other filings in the State Court Action

Exhibit E: List of Parties

Exhibit F: List of Counsel

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### Respectfully submitted,

#### BAKER BOTTS L.L.P.

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#### PROPOSED COUNSEL TO DEBTORS-IN-POSSESSION

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 26, 2016, a true and correct copy of the foregoing document was filed electronically with the Court and served on counsel for Saeed Rohi at the first address listed below, served on the Texas Attorney General's Office at the second address listed below, and emailed to: brewer@bplaw.com and susan.miller@texasattorneygeneral.gov.

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/s/ Omar J. Alaniz
Omar J. Alaniz