

STATE OF MINNESOTA**DISTRICT COURT****COUNTY OF RAMSEY****SECOND JUDICIAL DISTRICT****Case Type: Other Civil**

In re:

The assignment for the benefit of creditors of
LifeHealth, LLC

Court File No.: 62-cv-17-4154
Hon. Jennifer L. Frisch

**NOTICE OF MOTION AND MOTION REGARDING
PROCEDURAL ISSUES**

To: All parties on Master Service List

PLEASE TAKE NOTICE that on August 4, 2017, before the Honorable Jennifer L. Frisch, Judge of District Court, at the Ramsey County Courthouse, located at 15 W. Kellogg Blvd, St Paul, MN 55102, at 11:00 a.m., or as soon thereafter as counsel may be heard, DSI Assignments, LLC, the assignee in the above-captioned matter (the "Assignee"), will request an order of the Court (1) establishing a creditor claims procedure, (2) determining the sum and conditions of the Assignee bond, if any, (3) approving consent and subordination agreements between Assignee and Assignor LifeHealth, LLC's senior-secured lenders, (4) authorizing the terms of Assignee's compensation, (5) extending the statutory stay for an additional 90 days to allow the Assignee to conduct its work, and (6) granting such other relief as the Court may deem just and proper. This motion is supported by a memorandum of law and proposed order filed concurrently herewith.

Pursuant to Minn. Gen. R. Prac. 115.04, any response to this motion must be filed and served at least seven (7) days prior to the hearing. **UNLESS A RESPONSE OPPOSING THE**

MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION AND PROPOSED ORDER WITHOUT A HEARING PURSUANT TO MINN. STAT. §576.35.

STINSON LEONARD STREET LLP

Dated: July 21, 2017

By: s/ Benjamin J. Court

Robert T. Kugler (#194116)

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ATTORNEYS FOR ASSIGNEE

DSI ASSIGNMENTS, LLC

ACKNOWLEDGEMENT

The undersigned hereby acknowledges that costs, disbursements and reasonable attorney and witness fees may be awarded pursuant to Minn. Stat. § 549.211, to the parties against whom the allegations in the Summons and Complaint are asserted.

s/ Benjamin J. Court

Benjamin J. Court (# 319016)