# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	)	Chapter 7
PRIMARY HEALTH SYSTEMS, INC., PHS CLEVELAND, INC. PHS PHYSICIAN MANAGEMENT OF	)	Case No. 99-615 (JKF)
OHIO, INC., PHS MT. SINAI, INC., PRIMARY HEALTH SYSTEMS OF	)	Jointly Administered
OHIO, L.P., PHS ST. ALEXIS, INC., PHS LAURELWOOD, INC.,	) )	
PHS ROXBOROUGH, INC., and LOWER BUCKS, INC.,	) )	Objection deadline: May 13, 2003 at 4:00 p.m.
Debtors.	)	Hearing Date: To Be Determined
	)	

### NOTICE OF SEVENTH AND FINAL APPLICATION OF THE BAYARD FIRM FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES WITH RESPECT TO AVOIDANCE ACTIONS

PLEASE TAKE NOTICE that on April 23, 2003, The Bayard Firm, co-counsel to the Official Committee of Unsecured Creditors (the "Committee") filed its Seventh Interim and Final Application of The Bayard Firm for Interim Allowance of Compensation and Reimbursement of Expenses with Respect to Avoidance Actions for the Period of February 1, 2001 through and including February 21, 2003 (the "Application") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court").

PLEASE TAKE FURTHER NOTICE that any objections to the Application must be made in writing, filed with the Bankruptcy Court, Marine Midland Plaza, 824 Market Street, 5th Floor, Wilmington, DE 19801, and served upon, so as to actually be received by the undersigned counsel, on or before May 13, 2003 at 4:00 p.m. (Eastern Time).

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PLEASE TAKE FURTHER NOTICE that if an objection is properly filed in accordance with the above procedures, a hearing on the Application will be scheduled before the Honorable Judith K. Fitzgerald in the United States Bankruptcy Court. Only those persons interposing an objection made in writing, timely filed, and properly served will receive notice of such hearing. If no objections are timely filed in accordance with these procedures, the Bankruptcy Court may enter an order approving the Application without further notice or hearing.

Dated: April 23, 2003
Wilmington, Delaware

THE BAYARD FIRM

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Christopher A. Ward (No. 3877)

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Wilmington, Delaware 19899

(302) 655-5000

Co-Counsel to the Official Committee of Unsecured Creditors

## UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:

Chapter 7 Cases

PRIMARY HEALTH SYSTEMS, INC.,

PHS CLEVELAND, INC.,

PHS PHYSICIAN MANAGEMENT OF OHIO, IN.C, PHS MT. SINAI, INC.,

PRIMARY HEALTH SYSTEMS OF

OHIO, L.P., PHS ST. ALEXIS, INC.,

PHS LAURELWOOD, INC.,

PHS ROXBOROUGH, INC. and

LOWER BUCKS, INC.,

Case No. 99-615 (JKF)

Jointly Administered

Debtors.

### CERTIFICATION OF NO OBJECTION REGARDING DOCKET NO. 1970

The undersigned hereby certifies that, as of the date hereof, she has received no answer, objection or other responsive pleading to the Motion of Dell Marketing, L.P. to Extend Administrative Bar Date for Filing Administrative Expense Claim, filed March 4, 2003 [Docket No. 1970] (the "Motion"). The undersigned further certifies that after review of the Court's docket in this case, no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Motion, responses/objections were to be filed and served no later than April 17, 2003.

It is hereby respectfully requested that the Order attached to the Motion be entered at the earliest convenience of the Court.

Dated: April 23, 2003

SEITZ, VAN OGTROP & GREEN, P.A.

By:

/s/ Patricia P. McGonigle

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Wilmington, DE 19899

(302) 888-0600

(302) 888-0606 (fax)

DOCKET NO.: 1992

#### and

SABRINA L. STREUSAND State Bar No. 11701700 G. James Landon State Bar No. 24002445 Hughes & Luce, L.L.P. 111 Congress Avenue, Suite 900 Austin, TX 78701 (512) 482-6842 (512) 482-6859 (fax)

Attorneys for Movant Dell Marketing, L.P.

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