

(c) Susquehanna Village Facility Operations, LLC agrees to accept service of Plaintiff's Complaint and waives its right to challenge the sufficiency of service of Plaintiff's Complaint.

(d) The caption of this matter shall be amended to identify Defendant as Susquehanna Village Facility Operations, LLC

(e) Defendant Consulate Health Care never employed Plaintiff or the individuals in the class definition contained in the Complaint; and

(f) Based on its financial circumstances as they now exist and the scope of Plaintiff's claims as pled, Susquehanna Village Facility Operations, LLC would be able to satisfy any judgment that might be obtained in this matter.

2. Defendant Consulate Health Care agrees that, in the event that Plaintiff seeks to assert claims against it arising from or relating to the claims in this litigation as a result of a failure by Susquehanna Village Facility Operations, LLC to satisfy any judgment against it in this matter, it shall not assert as a defense the running of the statute of limitations with respect to the time period running from the date of filing of this action until the date of the final disposition of this action, including the resolution of any and all appeals.

3. The new caption is identified on the following page.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILMA KNAPP,

Plaintiff,

v.

SUSQUEHANNA VILLAGE
FACILITY OPERATIONS, LLC,

Defendant.

CIVIL ACTION

3:18-cv-01941-RDM

Stipulated and agreed by the parties, this 11th day of March, 2019.

/s/ R. Andrew Santillo

Peter Winebrake
R. Andrew Santillo
Mark Gottesfeld
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Counsel for Plaintiff

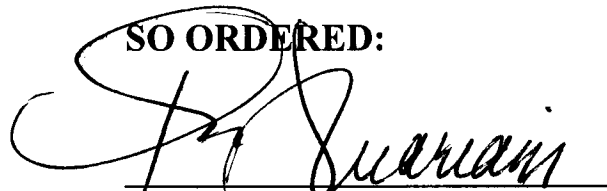
/s/ Adam Barnes (with permission)

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*Counsel for Susquehanna Village Facility
Operations, LLC and Consulate Health
Care*

Dated: March 13 2019

SO ORDERED:



Robert D. Mariani
United States District Judge