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MAY 22 2018

STATE HEALTH PLANNING
/ AND DEVELOPMENT AGENCY

LOREE J. SKELTON, LLC
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MAY 22, 2018

ELECTRONICALLY FILED VIA EMAIL TO:
SHPDA.ONLINE@SHPDA.ALABAMA.GOV

MR. ALVA LAMBERT
EXECUTIVE DIRECTOR
STATE HEALTH PLANNING AND DEVELOPMENT
100 NORTH UNION STREET, SUITE, 870
MONTGOMERY, ALABAMA 36104

**RE: NOTICE OF CHANGE OF OWNERSHIP: SAAD ENTERPRISES, INC., D/B/A SAAD
HEALTHCARE OF ST. CLAIR COUNTY, LLC, SHPDA ID: CON AL 2013-053, CON
2672-HH**

DEAR MR. LAMBERT:

**PLEASE ACCEPT THIS RESPONSE IN REGARD TO YOUR LETTER OF MAY 21, AS
CONFIRMATION THAT THE REFERENCE IN PARAGRAPH 2 UNDER "II. SCOPE OF
TRANSACTION" IS INTENDED TO REFERENCE THE TRANSFER OF CONTROL
PURSUANT TO THE TRANSFER OF THE UNDERLYING EQUITY INTEREST IN THE
CURRENT CON HOLDER, SAAD ENTERPRISES, INC., D/B/A SAAD HEALTHCARE
OF ST. CLAIR COUNTY, LLC, AND NOT A TRANSFER OF THE CON INTEREST
FROM THE CURRENT HOLDER TO ANOTHER ENTITY.**

**AS FURTHER CLARIFICATION, IN THE FRONT OF THE CON APPLICATION FORM
WE CHECKED THE BOX FOR "CHANGE IN CERTIFICATE OF NEED HOLDER (ALA.
CODE§ 22-20-271 (F))" BECAUSE THE CITED CODE SECTION PROVIDES THAT
THE TRANSFER OF EQUITY INTERESTS IN THIS TRANSACTION DOES NOT**

**MR. LAMBERT
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CONSTITUTE A TRANSFER OF THE CON ("THE TRANSFER OF EQUITY INTERESTS IN...ANY LEGAL ENTITY WHICH HOLDS A CERTIFICATE OF NEED SHALL NOT CONSTITUTE A TRANSFER, ASSIGNMENT, OR CONVERSION OF THE CERTIFICATE OF NEED.") IMMEDIATELY FOLLOWING THE TRANSACTION THE CON WILL CONTINUE TO BE HELD BY SAAD HEALTH OF ST. CLAIR COUNTY, LLC.

PLEASE CONSIDER THIS LETTER TO BE AN AMENDMENT OF THE MAY 15, 2018 NOTICE. IF A MORE FORMAL, AMENDED SUBSTITUTE PAGE NEEDS TO BE SUBMITTED, PLEASE ADVISE.

THANK YOU IN ADVANCE FOR YOUR REVIEW AND PROMPT RESPONSE.

VERY TRULY YOURS,

A handwritten signature in cursive script, appearing to read "Loree J. Skelton".

**LOREE J SKELTON,
ATTORNEY, ON BEHALF OF
SAAD ENTERPRISES, INC.**