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No. 397

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

NEW YORK HEALTHCARE )  
INSURANCE COMPANY, A RISK )  
RETENTION GROUP, )  
Plaintiff, )  
v. )  
OAK LAWN RESPIRATORY AND )  
REHABILITATION CENTER, LLC, an )  
Illinois Limited Liability Company and )  
HENRY MOORE, as Independent )  
Administrator of the Estate of WILLIAM )  
MOORE, Deceased, )  
Defendants. )

No. 1:16-cv-10609

## **PLAINTIFF'S CROSS-MOTION FOR JUDGMENT ON THE PLEADINGS**

Now comes the Plaintiff, New York Healthcare Insurance Company, a Risk Retention Group, by its attorneys, Pretzel & Stouffer, Chartered, and pursuant to Federal Rule of Civil Procedure 12(c) for Judgment on the Pleadings, moves this Honorable Court to enter Judgment in its favor and against Defendant Oak Lawn Respiratory and Rehabilitation Center, LLC. In support hereof, the Plaintiff submits its Memorandum of law.

Respectfully submitted:

**s/ Jonathan L. Federman**

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