

# WAIVER

## SUPREME COURT OF THE UNITED STATES

18-5537

Supreme Court Case No. \_\_\_\_\_

Alla Opengeym

(Petitioner)

v. Heartland Employment Services, LLC

(Respondent)

**I DO NOT INTEND TO FILE A RESPONSE** to the petition for a writ of certiorari unless one is requested by the Court.

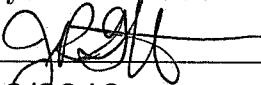
Please check the appropriate boxes:

Please enter my appearance as Counsel of Record for all respondents.

There are multiple respondents, and I do not represent all respondents. Please enter my appearance as Counsel of Record for the following respondent(s):  
\_\_\_\_\_  
\_\_\_\_\_

I am a member of the Bar of the Supreme Court of the United States.

I am not presently a member of the Bar of this Court. Should a response be requested, the response will be filed by a Bar member.

Signature 

Date: 08/28/2018

(Type or print) Name Jaclyn R. Giffen

Mr.  Ms.  Mrs.  Miss

Firm Littler Mendelson, P.C.

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Zip 48243

Phone 313.202.3261

Email jgiffen@littler.com

A COPY OF THIS FORM MUST BE SENT TO PETITIONER'S COUNSEL OR TO PETITIONER IF PRO SE. PLEASE INDICATE BELOW THE NAME(S) OF THE RECIPIENT(S) OF A COPY OF THIS FORM. NO ADDITIONAL CERTIFICATE OF SERVICE IS REQUIRED.

CC: Alla Opengeym, 7340 Silver Leaf Lane, West Bloomfield, MI 48322;  
and by email (allaopengeym@gmail.com)

No. 18-5537

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**IN THE SUPREME COURT OF THE UNITED STATES**

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**ALLA OPENGEYIM,**

Petitioner,

v.

**HEARTLAND EMPLOYMENT SERVICES, LLC**

Respondent.

On Petition for Writ of Certiorari to the  
United States Court of Appeals for the Sixth Circuit

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**STATEMENT OF DISCLOSURE OF CORPORATE  
AFFILIATIONS AND FINANCIAL INTEREST**

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Counsel of Record for Respondent Heartland  
Employment Services, LLC

**STATEMENT OF DISCLOSURE OF  
CORPORATE AFFILIATIONS AND FINANCIAL INTEREST**

Pursuant to S.Ct. Rule 29.6, Respondent, Heartland Employment Services, LLC, makes the following disclosure:

1. Is said corporate party a subsidiary or affiliate of a publicly owned corporation? No.
2. Is there a publicly owned corporation or its affiliate, not a party to the case, that has a substantial financial interest in the outcome of the litigation? Yes.

Parent Corporation/Affiliate Name: ProMedica Health System, Inc.

Nature of Financial Interest: ProMedica Health System, Inc. is an Ohio not-for-profit corporation whose sole member is HCR ManorCare, Inc. HCR ManorCare, Inc. is an Ohio not-for-profit corporation whose sole member is HCR Healthcare, LLC. HCR Healthcare, LLC is a Delaware Limited Liability Company whose sole member is Heartland Employment Services, LLC. Heartland Employment Services, LLC is a Delaware Limited Liability Company and does not have any members.

*/s/ Jaclyn R. Giffen*

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Dated: August 28, 2018