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Counsel to Brookfield Properties Retail Inc.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

BUTH-NA-BODHAIGE, INC.,

Chapter 7

Case No. 24-10392 (DSJ)

Debtor.

Chapter 7

## NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS, AND REQUEST TO BE ADDED TO MASTER SERVICE LIST

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**PLEASE TAKE NOTICE** that the undersigned appear in the above-captioned case on behalf of Brookfield Properties Retail Inc. ("Landlord"), and, pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Section 1109(b) of the Bankruptcy Code, request that all notices given or required to be given and all papers served in this case be delivered to and served upon the parties identified below at the following address and further requests to be added to any Master Service List maintained in this case:



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**PLEASE TAKE FURTHER NOTICE** that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile, or otherwise, in this case.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive Landlord's: (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Landlord is or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby reserved.

Dated: April 15, 2024

## **KELLEY DRYE & WARREN LLP**

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