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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BUTH-NA-BODHAIGE, INC.,

Debtor.

Chapter 7

Case No. 24-10392 (DSJ)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that LREP Acquisition III LLC (“LREP”), as creditor and proposed stalking horse purchaser, hereby appears in the above-captioned case by and through its counsel Cole Schotz P.C. and requests that all notices given or required to be given and all papers served in this case be delivered to and served upon the counsel identified below at the following address:

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PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Code section 1109(b) of the Bankruptcy Code, and Bankruptcy Rules 2002 and 9010(b) the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, requests, suggestions, complaint with demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise which may affect or seek to affect in any way the rights and interests of the creditors with respect to the Debtor or property or proceeds thereof in which LREP may assert a claim or interest, including any adversary proceedings filed in this matter.

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 LREP's: (i) right to have final orders in non-core matters entered only after de novo review by a United States District Court Judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court Judge in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which LREP is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: June 25, 2024

COLE SCHOTZ P.C.

By: /s/ Mark Tsukerman
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