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Attorneys for Ironshore Indemnity, Inc., Lexon Insurance Company and Bond Safeguard Insurance Company

UNITED STATES BANKRUPTCY COURT DISTRICT OF UTAH, CENTRAL DIVISION

In re:)	
)	Case No. 16-24818
CS Mining, LLC,)	
)	Chapter 11
Debtor.)	
)	Judge William T. Thurman

NOTICE OF APPEARANCE AND DEMAND FOR NOTICE AND PAPERS

PLEASE TAKE NOTICE, that Ironshore Indemnity, Inc., Lexon Insurance Company and Bond Safeguard Insurance Company, hereby appear in the abovecaptioned case pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and hereby requests, pursuant to the Bankruptcy Rules 2002 and 9007 and Section 342 of the United States Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the persons listed below at the following address and telephone number: TERRY JESSOP & BITNER Richard C. Terry, Esq. 341 South Main Street, Suite 500 Salt Lake City, Utah 84111 Telephone: (801) 534-0909 Facsimile: (801) 534-1948 Email: richard@tjblawyers.com

-and-

HARRIS BEACH PLLC Lee E. Woodard, Esq. 333 West Washington Street, Suite 200 Syracuse, New York 13202 Telephone: (315) 423-7100 Facsimile: (315) 422-9331 Email: Iwoodard@harrisbeach.com bkemail@harrisbeach.com

PLEASE TAKE FURTHER NOTICE, that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, monthly operating report, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by e-mail, facsimile, telephone, telegraph, telex, or otherwise filed or made with regard to the above captioned cases and proceedings therein.

The Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of the rights of Ironshore Indemnity, Inc., Lexon

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Insurance Company and Bond Safeguard Insurance Company: (1) to have a final order in noncore matters entered only after <u>de novo</u> review by a District Judge; (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; and (3) for any other rights, claims, actions, setoffs or recoupments to which Ironshore Indemnity, Inc., Lexon Insurance Company and Bond Safeguard Insurance Company are or may be entitled, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 6, 2017

TERRY JESSOP & BITNER

Attorneys Ironshore Indemnity, Inc., Lexon Insurance Company, and Bond Safeguard Insurance Company

<u>/s/ Richard C. Terry</u> Richard C. Terry

-and-

HARRIS BEACH PLLC Attorneys Ironshore Indemnity, Inc., Lexon Insurance Compan, and Bond Safeguard Insurance Company /s/ Lee E. Woodard Lee E. Woodard Case 16-24818 Doc 596 Filed 04/06/17 Entered 04/06/17 16:28:07 Desc Main Document Page 4 of 4

CERTIFICATE OF SERVICE

I, Richard C. Terry, local counsel for Ironshore Indemnity, Inc., Bond Safeguard Insurance Co. and Lexon Insurance Co., hereby certify that on April 6, 2017, I served a copy of the foregoing **NOTICE OF APPEARANCE AND DEMAND FOR NOTICE AND PAPERS** upon the following by first class mail, postage prepaid; or by filing this pleading electronically as an ECF registered attorney of the United States District Court, I caused the same to be served via ECF.

Donald J. Detweiler, Esq. (Via ECF) PEPPER HAMILTON, LLC *Attorney for Debtor* Hercules Plaza, Suite 5100 P.O. Box 1709 Wilmington, Delaware 19899-1709 Email: <u>detweilerd@pepperlaw.com</u>

U.S. Trustee (Via ECF) Ken Garff Bldg. 405 South Main Street Suite 300 Salt Lake City, UT 84111

/s/ Richard C. Terry