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Vincent J. Roldan

*Co-Counsel for General Ore International Corporation Limited,
Neu Holdings U.S. Corporation, Neu Foundation of California,
and Janice K. Moss*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

Chapter 11

LEHMAN BROTHERS INC., *et al.*

Case No. 08-01420 (SCC) (SIPA)

Debtors.

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NOTICE OF APPEARANCE AND DEMAND FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE THAT Vincent J. Roldan and the law firm of Ballon Stoll Bader & Nadler, P.C. hereby enter their appearance as co-counsel to General Ore International Corporation Limited, Neu Holdings U.S. Corporation, Neu Foundation of California, and Janice K. Moss (collectively, "Claimants")¹ and hereby request that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the persons listed below at the following addresses, telephone number and electronic mail addresses:

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¹ Claimants are also continuing to be jointly represented herein by the law firm of Thompson Coburn LLP.

PLEASE TAKE FURTHER NOTICE, that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules, 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 mail, e-mail, facsimile, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of the right of Claimants: (1) to have final orders in noncore matters entered only after de novo 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, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) or any other rights, claims, actions, setoffs, or recoupments to which Claimants are or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Claimants expressly reserve.

Dated: May 12, 2017
New York, New York

Respectfully submitted,

BALLON STOLL BADER & NADLER, P.C.

By: /s/ Vincent J. Roldan
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