## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

GENON ENERGY, INC., et al., Case No. 17-33695 (DRJ)

Chapter 11

Debtors. Jointly Administered

## NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that the following attorneys, duly admitted and qualified to practice before this court, hereby file, pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure, a notice of their appearance on behalf of the NATURAL GAS LITIGATION WISCONSIN CLASS PLAINTIFFS, consisting of Arandell Corporation, Briggs & Stratton Corporation, Carthage College, Ladish Co., Inc. (n/k/a ATI Ladish, LLC), Merrick's, Inc., NewPage Wisconsin System Inc. (n/k/a Verso Minnesota Wisconsin LLC), and Sargento Foods, Inc., creditors in the above-captioned case:

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The attorneys request that they receive, in addition to notice of matters set forth in Rule 2002, all notices issued in the above captioned case after the date of this Notice; and attorneys further request a copy of all documents filed in the above captioned case after the date of this Notice, including but not limited to motions and other pleadings, stipulations, settlement agreements or orders of any kind.

Attorneys further request that the Debtor and Clerk of the United States Bankruptcy

Court <u>also place the attorneys' names and address on the master mailing matrix and any</u>

<u>abbreviated service list</u> in the above captioned proceeding.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notices nor any previous or subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the Natural Gas Litigation Wisconsin Class Plaintiffs' (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (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so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the Natural Gas Litigation Wisconsin Class Plaintiffs' are or may be entitled in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Also, this Notice of Appearance shall not be deemed to be implied consent to jurisdiction of the Bankruptcy Court over any claim or category of claims that the Bankruptcy Court may not have authority to adjudicate.

Dated: July 19, 2017

KOHNER, MANN & KAILAS, S.C. Attorneys for Natural Gas Litigation Wisconsin Class Plaintiffs

By: /s Samuel C. Wisotzkey

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 19, 2017 he caused the foregoing to be electronically filed with the Clerk of the Court using the ECF system that will send notification of such filing to the parties indicated on the Notice of Electronic Filing.

By: /s Samuel C. Wisotzkey
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