

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 15
)	
THE ALDO GROUP INC., <i>et al.</i> ,)	Case No. 20-11060-KBO
)	
Debtors.)	
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**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PAPERS**

To: The Clerk of the Above-Named Court

Please enter my appearance as counsel for the Taubman Landlords,¹ as Creditors, in the above-named action. This appearance is intended solely for the purpose of receiving notices and it is not intended that the filing of this appearance be deemed a submission to the jurisdiction of this Court.

Request is hereby made, pursuant to Bankruptcy Rule 2002(g), that all notices required to be electronically delivered and/or mailed to creditors under Bankruptcy Rule 2002 at the following address:

Andrew S. Conway, Esq.
200 East Long Lake Road, Suite 300
Bloomfield Hills, Michigan 48304
Email address: aconway@taubman.com

Dated: May 8, 2020

Andrew S. Conway,
Attorney for the Taubman Landlords

By: /s/ Andrew S. Conway
Andrew S. Conway, Esq.
200 East Long Lake Road, Suite 300
Bloomfield Hills, Michigan 48304
(248) 258-7427 Phone
Email address: aconway@taubman.com

¹ The Taubman Landlords are the owners of certain regional retail shopping centers, which include the following: LaCienega Partners Limited Partnership, commonly known as Beverly Center, located in Los Angeles, California; Taubman Cherry Creek Shopping Center, L.L.C., commonly known as Cherry Creek Shopping Center, located in Denver, Colorado; City Creek Center Associates LLC, commonly known as City Creek Center, located in Salt Lake City, Utah; Country Club Plaza JV LLC, commonly known as Country Club Plaza, located in Kansas City Missouri; Dolphin Mall Associates LLC, commonly known as Dolphin Mall, located in Miami, Florida; The Gardens on El Paseo LLC, commonly known as The Gardens on El Paseo and El Paseo Village, located in Palm Desert, California; Fairfax Company of Virginia L.L.C., commonly known as Fair Oaks Mall, located in Fairfax, Virginia; Taubman Auburn Hills Associates Limited Partnership, commonly known as Great Lakes Crossing Outlets, located in Auburn Hills, Michigan; Green Hills Mall TRG LLC, commonly known as The Mall at Green Hills, located in Nashville, Tennessee; commonly known as International Plaza, located in Tampa, Florida; Short Hills Associates, L.L.C., commonly known as The Mall at Short Hills, located in Millburn, New Jersey; Rich-Taubman Associates, commonly known as Stamford Town Center, located in Stamford, Connecticut; Sunvalley Shopping Center LLC, commonly known as Sunvalley Shopping Center, located in Concord, California; TVO Mall Owner LLC, commonly known as Twelve Oaks Mall, located in Novi, Michigan; TB Mall at UTC LLC, commonly known as The Mall at University Town Center, located in Sarasota, Florida; and West Farms Mall, LLC, commonly known as Westfarms, located in West Hartford, Connecticut.

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**NOTICE OF FILING OF
GENERAL POWER OF ATTORNEY**

To: Clerk of the Above-Named Court:

Please take notice that the undersigned has been authorized to vote on any questions that may be lawfully submitted to creditors of the debtors in the above-entitled case; to vote for a trustee of the estate of the debtors and for a committee of creditors to execute in the name of the Taubman Landlords¹ (the “Claimants”), and on their behalf, and to file and prosecute, one or more proofs of claim, any supplements of amendments to proofs of claims; to receive dividends; and in general to perform any acts for the claimants in all matters arising in this case, pursuant to a General Power of Attorney, dated August 2, 2018 (a copy of which is attached hereto as Exhibit A).

Dated: May 8, 2020

Andrew S. Conway,
Attorney for the Taubman Landlords

By: /s/ Andrew S. Conway
Andrew S. Conway, Esq.
200 East Long Lake Road, Suite 300
Bloomfield Hills, Michigan 48304
(248) 258-7427 Phone
Email address: aconway@taubman.com

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CERTIFICATE OF SERVICE

Mona K. Jabr, being first duly sworn, deposes and says that she is an employee of The Taubman Company, and that on May 8, 2020, she served a copy of the **Notice of Appearance and Request for Service of Notices and Papers, Notice of Filing of General Power of Attorney**, and this **Certificate of Service** via Notice of Electronic Filing and/or by enclosing the papers in sealed envelopes with first-class postage fully prepaid and depositing the envelopes and their contents in the United States mail, addressed as follows:

Morris Nichols Arsht & Tunnel
Paige Noelle Topper
1201 N. Market Street
Wilmington, DE 19801

Office of the United States Trustee
J. Caleb Boggs Federal Building
844 King Street, Suite 2207
Lockbox 35
Wilmington, DE 19801

/s/ Mona K. Jabr
Mona K. Jabr

EXHIBIT A

GENERAL POWER OF ATTORNEY

To: Andrew S. Conway, Esq.
200 East Long Lake Road
Suite 300
Bloomfield Hills, Michigan 48304

The undersigned, on behalf of The Taubman Company LLC, d/b/a The Taubman Company, the managing agent for the “Taubman Landlords” (see attached list), hereby authorizes you as attorney in fact for the Taubman Landlords and with full power of substitution, to vote on any question that may be lawfully submitted to creditors of the debtor in any bankruptcy action in which any of the Taubman Landlords are creditors; to vote for a trustee of the estate of the debtor and for a committee of creditors; to execute in the name of the Taubman Landlords and on each of their behalf, and to file and prosecute, one or more proofs of claim, any supplements of amendments to proofs of claims; to receive dividends; and in general to perform any act for any of the Taubman Landlords in any bankruptcy action in which any of the Taubman Landlords are creditors.

Dated: August 2, 2018

The Taubman Company LLC,
a Delaware limited liability company, as
Managing Agent for the Taubman Landlords

By: /s/ _____
Chris B. Heaphy

Its: Executive Vice President, General Counsel
and Secretary

ACKNOWLEDGMENT

Acknowledged before me on August 2, 2018, by Chris B. Heaphy, who states that he is the Executive Vice President, General Counsel and Secretary of The Taubman Company LLC, d/b/a The Taubman Company, the Managing Agent for the Taubman Landlords, and is authorized to execute this Power of Attorney on behalf of the Taubman Landlords.

/s/ _____
Mona K. Jabr
Notary Public, Oakland County, Michigan
My commission expires: May 4, 2023
Acting in Oakland County, Michigan

TAUBMAN LANDLORDS

<u>Landlord</u>	<u>Center Name</u>
La Cienega Partners Limited Partnership, a Delaware limited partnership	Beverly Center Los Angeles, California
Charleston Center LLC, a Delaware limited liability company	Charleston Place Charleston, South Carolina
Taubman-Cherry Creek Limited Partnership, a Colorado limited partnership	Olde Cherry Creek Denver, Colorado
Taubman-Cherry Creek Shopping Center L.L.C., a Delaware limited liability company	Cherry Creek Denver, Colorado
City Creek Center Associates LLC, a Delaware limited liability company	City Creek Center Salt Lake City, Utah
Country Club Plaza JV LLC, a Delaware limited liability company	Country Club Plaza Kansas City, Missouri
Dolphin Mall Associates LLC, a Delaware limited liability company	Dolphin Mall Miami, Florida
El Paseo Village LLC, a Delaware limited liability company	El Paseo Village Palm Desert, California
Fairfax Company of Virginia L.L.C., a Virginia limited liability company	Fair Oaks Fairfax, Virginia
The Gardens on El Paseo LLC, a Delaware limited liability company	The Gardens on El Paseo Palm Desert, California
Taubman Auburn Hills Associates Limited Partnership, a Delaware limited partnership	Great Lakes Crossing Outlets Auburn Hills, Michigan
Green Hills Mall TRG LLC, a Delaware limited liability company	The Mall at Green Hills Nashville, Tennessee
TRG IMP LLC a Delaware limited liability company	International Market Place Honolulu, Hawaii
Tampa Westshore Associates Limited Partnership, a Delaware limited partnership	International Plaza Tampa, Florida

Landlord

Center Name

Plaza Internacional Puerto Rico LLC,
a Puerto Rico limited liability company

The Mall of San Juan
San Juan, Puerto Rico

Short Hills Associates, L.L.C.,
a Delaware limited liability company

The Mall at Short Hills
Millburn, New Jersey

Rich-Taubman Associates,
a Connecticut general partnership

Stamford Town Center
Stamford, Connecticut

SunValley Shopping Center LLC,
a Delaware limited liability company

SunValley
Concord, California

TVO Mall Owner LLC,
a Michigan limited liability company

Twelve Oaks Mall
Novi, Michigan

TB Mall at UTC LLC,
a Delaware limited liability company

The Mall at University Town Center
Sarasota, Florida

West Farms Mall, LLC,
a Delaware limited liability company

Westfarms Mall
West Hartford/Farmington,
Connecticut