IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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IN RE:

Tuesday Morning Corporation, et al, 1

Debtors.

Chapter 11 Case No. 20-31476

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE AND PAPERS

Pursuant to Rules 2002(g) and 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned counsel enter an appearance for: ARC MCLVSNV001, LLC, ARC TSKCYMO001, LLC, Brixmor Operating Partnership LP, C.E. John Company, Inc., Centerpoint Owner, LLC, Deutsche Asset & Wealth Management, Federal Realty Investment Trust, Gateway Miramar LLC, New Market Properties, LLC, NNN Ponte Vedra FL Owner LP, and The Macerich Company (the "*Landlords*"), parties in interest and creditors in the above-styled bankruptcy cases, and request that copies of all pleadings, motions, notices, and other papers filed or served in this proceeding be served upon the undersigned counsel for the Landlords, at the following street addresses, e-mail addresses, or facsimile numbers:

> Michael P. Cooley Devan J. Dal Col REED SMITH LLP 2850 N. Harwood, Suite 1500 Dallas, Texas 75201 T: 469.680.4200 F: 469.680.4299 <u>mpcooley@reedsmith.com</u> <u>ddalcol@reedsmith.com</u>

Dustin P. Branch BALLARD SPAHR, LLP 2029 Century Park East Suite 800 Leslie C. Heilman Laurel D. Roglen BALLARD SPAHR, LLP

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at https://dm.epiq11.com/case/tuesdaymorning/info.

Los Angeles, CA 90067-2909 <u>BranchD@ballardspahr.com</u> T: 424.204.4400 F: 424-204.4350 919 North Market Street, 11th Floor Wilmington, DE 19801-3034 <u>HeilmanL@ballardspahr.com</u> <u>RoglenL@ballardspahr.com</u> T: 302.252.4465 F: 302.252.4466

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, all orders, notices, applications, motions, petitions, pleadings, requests, complaints, demands, replies, and answers, including all amendments to any of the foregoing, whether formal or informal, and whether transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive the Landlords' (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 in any case, controversy, or adversary proceeding; (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 Landlords are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

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Dated: June 28, 2020

Respectfully submitted,

REED SMITH LLP

By: /s/ Michael P. Cooley

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*Pro Hac Vice Admission Requested

Counsel for ARC MCLVSNV001, LLC, ARC TSKCYM0001, LLC, Brixmor Operating Partnership LP, C.E. John Company, Inc., Centerpoint Owner, LLC, Deutsche Asset & Wealth Management, Federal Realty Investment Trust, Gateway Miramar LLC, New Market Properties, LLC, NNN Ponte

Vedra FL Owner LP, and The Macerich Company

CERTIFICATE OF SERVICE

I hereby certify that, on June 28, 2020, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas on those parties registered to receive electronic notices.

/s/ Michael P. Cooley Michael P. Cooley