

FOX ROTHSCHILD, LLP

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Counsel to 575 Lex Property Owner LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE**

In re:

**TOWN SPORTS INTERNATIONAL, LLC,
et al.,**

Debtors.

Chapter 11

Case No. 20-12168 (CSS)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Fox Rothschild, LLP hereby appears on behalf 575 Lex Property Owner LLC ("575 Lex"), pursuant to Section 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 - 1532 (the "Bankruptcy Code"), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). 575 Lex hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007, and the applicable Local Rules, that all notices given or required to be given in these cases and all papers served or required to be served in these cases, be given to and served upon the following:

FOX ROTHSCHILD, LLP

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¹ The last four digits of Town Sports International, LLC's federal tax identification number are 7365. The mailing address for Town Sports International, LLC is 399 Executive Boulevard, Elmsford, New York 10523. Due to the large number of debtors in these cases, for which the Debtors have requested joint administration, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://dm.epiqll.com/TownSports>, or by contacting the proposed undersigned counsel for the Debtors.

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telex or otherwise filed or made with regard to the referenced cases and proceedings herein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive any rights of 575 Lex to: (1) challenge the jurisdiction of the Court to adjudicate any matter, including, without limitation, any non-core matter; (2) have final orders in non-core matters entered only after *de novo* review by the District Court; (3) trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases; (4) have the District Court withdraw that reference in any matter subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, setoffs, or recoupments to which Sourcebooks, is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: July 23, 2021

FOX ROTHSCHILD LLP

/s/ Joseph J. DiPasquale

Joseph J. DiPasquale, Esq.

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Counsel to 575 Lex Property Owner LLC

CERTIFICATION OF SERVICE

I hereby certify that on July 23, 2021 a copy of the foregoing NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS was served by: (1) electronic notification through the CM/ECF System on all parties registered to receive notice in this case.

FOX ROTHSCHILD LLP

By: /s/ Joseph J. DiPasquale

Joseph J. DiPasquale