

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)
STEPHEN M. PACKMAN (SP1589)

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Local Counsel for Roger Frankel, as the Future
Claimants' Representative in the Cyprus
Mines Chapter 11 Case

In Re:

LTL MANAGEMENT LLC,¹

Debtor.

Case No. 21-30589 (MBK)

Chapter 7

Hon. Michael B. Kaplan

**NOTICE OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that ARCHER & GREINER, P.C. appear as local counsel for ROGER FRANKEL, AS THE FUTURE CLAIMANTS' REPRESENTATIVE IN THE CYPRUS MINES CHAPTER 11 CASE (the "**FCR**"), pursuant to Rules 2002, 3017(a), 9007, 9019(b), 9013 and 9027 of the Federal Rules of Bankruptcy Procedure and section 1109(b) of Title 11 of the United States Code, and request that all notices be given to and served upon:

ARCHER & GREINER, P.C.
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*Local Counsel to Roger Frankel, as the
Future Claimants' Representative in the
Cyprus Mines Chapter 11 Case*

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the rules specified above but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, personal delivery, telephone, e-mail or otherwise, which affect the FCR and/or the above-captioned Debtor or its property.

PLEASE TAKE FURTHER NOTICE that demand is also made that the FCR and the undersigned be added to the notice list of all contested matters, adversary proceedings, and other proceedings in the above-captioned case.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall be construed to waive (a) any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in these case or any case, controversy, or proceeding related to this case, or (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (b) any other rights, claims, actions, defenses, setoffs or recoupments whether under agreements, in law or in equity or otherwise, all of which are expressly reserved.

ARCHER & GREINER, P.C.
Local Counsel for Roger Frankel, as the Future
Claimants' Representative in the Cyprus
Mines Chapter 11 Case

By: /s/ Stephen M. Packman
Stephen M. Packman

Dated: December 3, 2021