

WINDELS MARX LANE & MITTENDORF, LLP
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re

AMSTERDAM HOUSE CONTINUING CARE
RETIREMENT COMMUNITY, INC.,
d/b/a THE HARBORSIDE,

Chapter 11

Case No. 8-23-70989-ast

Debtor.
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NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that:

1. Under Federal Rules of Bankruptcy Procedure 2002, 9007 and 9010(b), and 11 U.S.C. §§ 102(1), 342, and 1109(b), the undersigned attorneys appear as counsel for *Joan B. Simon, Administrator of the Estate of Pauline Blum a/k/a Pauline Luban Blum* (the “***Blum Estate***”), and request that all notices given or required to be given in this case and all related cases and proceedings, and all papers served or required to be served in this case and all related cases and proceedings, be given to and served upon:

Howard L. Simon, Esq.
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2. This request includes not only the notices and papers, whether formal or informal, *ex parte* or on notice, written or oral, referred to in the Bankruptcy Rules and Code sections 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, courier, hand delivery, telephone, telegraph, telecopier, electronically, or otherwise, which affect or seek to affect in any way the Debtor, any right or interest of the Debtor, or affects or seeks to affect any rights or interest of any party in interest in this case or any related proceeding.

3. Neither this Notice nor any later appearance, pleading, claim, or suit shall waive the right of the Blum Estate to have final orders in noncore matters entered only after *de novo* review by a District Judge; or the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in other applicable forums, or any other rights, claims, actions, defenses, setoffs, or recoupments to which these entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: New York, New York
May 9, 2023

WINDELS MARX LANE & MITTENDORF, LLP
*Attorneys for Joan B. Simon, Administrator of the
Estate of Pauline Blum a/k/a Pauline Luban Blum*

By: /s/ Howard L. Simon
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CERTIFICATION OF SERVICE

On May 9, 2023, I caused a true copy of the above *Notice of Appearance and Request for Notice* to be served by United States Postal service first class mail to each party on the attached service list at that party's last known address or at the address so designated by such party, or by electronic mail only to each party for whom an electronic mail address is listed.

In addition, by filing the foregoing Notice on the docket for this case through the Case Management/Electronic Case Filing System for the United States Bankruptcy Court for the Eastern District of New York (the "**CM/ECF System**"), registered users of the CM/ECF System designated to receive electronic notice of events in this case through the CM/ECF System received notice of this filing in accordance with Rules 9036-1 and 9036-2 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Eastern District of New York, and Federal Rule of Bankruptcy Procedure 9036.

Dated: New York, New York
May 9, 2023

WINDELS MARX LANE & MITTENDORF, LLP
*Attorneys for Joan B. Simon, Administrator of the
Estate of Pauline Blum a/k/a Pauline Luban Blum*

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