

**IN THE UNITED STATES BANKRUPTCY COURT
FOR SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

DREAMWELL, LTD.,

Reorganized Debtor.

Chapter 11

Case No. 23-90024 (CML)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedures and section 1109(b) of the Bankruptcy Code, Kelley Drye & Warren LLP hereby enters its appearance as counsel to the Serta Simmons Class 6B Trust (the “Trust”) and request that copies of all pleadings, documents and notices filed, served, or to be served in the above-captioned case be given and served upon the following attorneys:

Eric R. Wilson, Esq. (admitted *pro hac vice*)
Jason R. Adams, Esq. (admitted *pro hac vice*)
Philip A. Weintraub, Esq. (admitted *pro hac vice*)

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the pleadings, documents and notices referred to in Bankruptcy Rule 2002, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints, demands, answers or replies,

whether formal or informal, written or oral, transmitted or conveyed by mail, hand delivery, telephone, facsimile, email, or otherwise filed or made with regard to the above-captioned case.

PLEASE TAKE FURTHER NOTICE that neither this notice, any subsequent appearance, pleading, claim or participation in this case shall not be deemed or construed to constitute a waiver of any substantive or procedural right of the Trust including, without limitation: (i) the right to have final orders in non-core matters entered only after de novo review by the United States District Court for the Southern District of Texas (the “District Court”), (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court; or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Trust is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Trust expressly states otherwise, the Trust does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

Dated: Houston, Texas
October 23, 2023

KELLEY DRYE & WARREN LLP

/s/ Sean T. Wilson

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Counsel to the Serta Simmons Class 6B Trust

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the October 23, 2023, a true and correct copy of the foregoing document was served via ECF notification on all parties entitled to ECF notification in this case.

/s/ Sean T. Wilson

Sean T. Wilson