M. Jermaine Watson State Bar No. 24063055 **CANTEY HANGER LLP** 600 West 6th Street, Suite 300 Fort Worth, Texas 76102 Phone: 817-877-2800 Fax: 817-877-2807 Email: jwatson@canteyhanger.com

and Ross Tower 500 N. Akard St., Suite 2940 Dallas, TX 75201 Telephone: 214-978-4102 Facsimile: 214-978-4150

COUNSEL TO SANTIVA, LLC

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

In Re:

Chapter 11

COTTONWOOD FINANCIAL LTD., et al.,<sup>1</sup>

Debtors.

Case No. 24-80035-SWE11

(Jointly Administered)

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PLEADINGS

Cantey Hanger LLP hereby files its Notice of Appearance and Request for Service of

Notices and Pleadings (the "Notice of Appearance") as counsel for Santiva, LLC ("Client")

pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure. The

Client requests that notices of any actions taken, adversary proceedings, contested matters, or

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtors' federal tax identification number are as follows: Cottonwood Financial Ltd. (1001); Cottonwood Financial Administrative Services, LLC (7228); Cottonwood Financial Texas, LLC (9059); Cottonwood Financial Idaho, LLC (5651); Cottonwood Financial Wisconsin, LLC (7075). The Debtors' principal offices are located at 2100 W Walnut Hill Lane, Suite 300, Irving, TX 75038.

motions filed by any other party-in-interest, including the Debtors, be served on it at the following addresses:

M. Jermaine Watson State Bar No. 24063055 **CANTEY HANGER LLP** 600 West 6th Street, Suite 300 Fort Worth, Texas 76102 Phone: 817-877-2800 Fax: 817-877-2807 Email: jwatson@canteyhanger.com

and

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Further, counsel's request includes the notices and papers referred to in the rules specified above and also includes, without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, answering or reply papers, memoranda, and briefs in support of any of the foregoing and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, delivery, telephone, telegraphy, telecopy, telex, or otherwise.

Further, this Notice of Appearance is not intended to be, and shall not constitute, a consent by the Client to the Bankruptcy Court's subject matter jurisdiction, personal jurisdiction, venue, or core jurisdiction, shall not constitute a waiver of strict service in connection with any adversary proceeding, shall not constitute a waiver of strict service in connection with any adversary proceeding related to this bankruptcy case, and shall not constitute a waiver of the Client's: (i) right to have final orders in non-core matters entered only after de novo review by a District Court judge; (ii) right to trial by jury in any proceeding so triable in this case or any case, controversy,

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or proceeding related to this case; (iii) right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which Client is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Client expressly reserves.

Dated: May 6, 2024 Dallas, Texas

Respectfully submitted by,

<u>/s/ M. Jermaine Watson</u> M. Jermaine Watson State Bar No. 24063055 **CANTEY HANGER LLP** Cantey Hanger Plaza 600 West 6th Street, Suite 300 Fort Worth, TX 76102 Telephone: 817-877-2800 Facsimile: 817-333-2961 Email: jwatson@canteyhanger.com

and

Ross Tower 500 N. Akard St., Suite 2940 Dallas, TX 75201 Telephone: 214-978-4102 Facsimile: 214-978-4150

# COUNSEL TO SANTIVA, LLC

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 6, 2024 a true and correct copy of the foregoing document was served electronically by the Court's PACER system on those parties that have entered their appearance in this chapter 11 case and are registered to receive electronic notice.

<u>/s/ M. Jermaine Watson</u> M. Jermaine Watson