

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AIG FINANCIAL PRODUCTS CORP.,

Debtor.¹

Chapter 11

Case No. 22-11309 (MFW)

AIG FINANCIAL PRODUCTS CORP.,

Plaintiff,

v.

Adv. Proc. No. 23-50110 (MFW)

LEE ARTHURS; DAVID ACKERT;
MITCHELL BELL; ERIK BENGTSON;
PAUL BRADSHAW; THOMAS BUTTKE;
JOHN CAPPETTA; DAVID CHANG;
ROBERT CHANG; JASON DESANTIS;
RICHARD FABBRO; KENNETH FARRAR;
JONATHAN FRAADE; CARL GIESLER
JR.; JAMES HAAS; CHARLES HSIEH;
THOMAS KALB; THOMAS KUSHNER;
ROBERT LEARY; JONATHAN
LIEBERGALL; NATHANIEL LITWAK;
BRENDAN LYNCH; ALFRED MEDIOLI;
MATTHEW MIHALY; JOANN PALAZZO;
EUGENE PARK; ANDREW PARTNER;
CARL PETERSON; STEVEN PIKE;
THOMAS PLAGEMANN; ROBERT
POWELL; DANIEL RAAB; ANN REED;
PAUL SCHREINER; DMITRY
SATANOVSKY; MARY HEATHER
SINGER; KEITH STEIN; FRANK
STROHM; TIMOTHY SULLIVAN JR.;
CHRISTIAN TOFT; JOE TOM; RYAN
VETTER; STEVEN WAGAR; THOMAS
WARD; MARTIN WAYNE; JAMES WOLF.

Defendants.

¹ The Debtor in this case, along with the last four digits of the Debtor's federal tax identification number, is: AIG Financial Products Corp. (9410). The Debtor's address is 50 Danbury Road, Wilton, Connecticut 06897.

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

PLEASE TAKE NOTICE that the attorneys set forth below hereby appear on behalf of intervenor-party American International Group, Inc. (“**AIG**”) and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and Sections 1109(b) and 342 of Title 11 of the United States Code, as amended (the “**Bankruptcy Code**”), that all notices given in the above-captioned adversary proceeding and all papers served or required to be served in the above-captioned adversary proceeding be given to and served upon the undersigned counsel at the addresses set forth below:

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules, 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, delivery, telephone, electronic mail or otherwise.

PLEASE TAKE FURTHER NOTICE that this appearance and demand for notice is neither intended as nor is it a consent of AIG to the jurisdiction and/or venue of the Bankruptcy Court nor, specifically, but not limited to, a waiver of (i) AIG's right to trial by jury in any proceeding so triable herein, or in any case, controversy or proceeding related hereto, (ii) AIG's right to have an Article III judge adjudicate in the first instance any case, proceeding, matter or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution, (iii) AIG's right to have the reference withdrawn by the District Court in any case, proceeding, matter or controversy subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, set-offs, or recoupments to which AIG is or may be entitled to under any agreement, in law, or in equity, all of which rights, claims, actions, defenses, set-offs, and recoupments AIG expressly reserves.

Dated: March 12, 2025
Wilmington, Delaware

/s/ Zachary I. Shapiro

RICHARDS, LAYTON & FINGER, P.A.

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Attorneys for American International Group, Inc.

CERTIFICATE OF SERVICE

I, Zachary I. Shapiro, hereby certify that on March 12, 2025, a copy of the foregoing *Amended Notice of Appearance and Demand for Services of Notices and Papers* was served upon the parties on the attached service list in the manner indicated.

/s/ Zachary I. Shapiro

Zachary I. Shapiro (No. 5103)

SERVICE LIST

<p><u>Via CM/ECF & Email</u></p> <p>Michael S. Neiburg Kara Hammond Coyle Shane M. Reil YOUNG CONAWAY STARGATT & TAYLOR, LLP Rodney Square 1000 North King Street Wilmington, Delaware 19801 Tel: (302) 571-6600 Fax: (302) 571-1253 Email: mneiburg@ycst.com kcoyle@ycst.com sreil@ycst.com</p>	<p><u>Via CM/ECF & Email</u></p> <p>Nicolas Jenner Matthew B. McGuire LANDIS RATH & COBB LLP 919 Market Street, Suite 1800 Wilmington, Delaware 19801 Tel: (302) 467-4400 Fax: (302) 467-4450 Email: jenner@lrclaw.com mcguire@lrclaw.com</p>
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