

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

In re: **CASE NO. 11-40603-RBR**
RUDEN MCDLOSKY P.A., **CHAPTER 11**
Debtor.

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**NOTICE OF APPEARANCE AND RESERVATION
OF RIGHTS ON BEHALF OF GREENSPOON MARDER P.A.**

PLEASE TAKE NOTICE that the undersigned hereby appears for Greenspoon Marder, P.A. (“Greenspoon”), a creditor and/or party-in-interest, and under, *inter alia*, F.R.B.P. 2002, 9007, and 9010 and § 1109(b) of the Bankruptcy Code, requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon the undersigned.

PLEASE TAKE FURTHER NOTICE that pursuant to § 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules set forth above, but also includes, without limitation, any and all other orders and notices of application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted by or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including Greenspoon with respect to: (a) the debtor; (b) property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others

that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct by Greenspoon.

PLEASE TAKE NOTICE that Greenspoon intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive (1) Greenspoon's right to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) Greenspoon's right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) Greenspoon's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, recoupments, or remedies to which Greenspoon is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments, and remedies Greenspoon expressly reserves.

DATED this 2nd day of November 2011.

/s/ Mariane L. Dorris

R. Scott Shuker, Esq.

Florida Bar No. 984469

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the **NOTICE OF APPEARANCE AND RESERVATION OF RIGHTS ON BEHALF OF GREENSPOON MARDER**, has been furnished by either electronic transmission and/or U.S. First Class mail, postage prepaid, to: Greenspoon Marder, PA, Attn: Gerry Greenspoon, Trade Centre South, 100 West Cypress Creek Road, Suite 700, Fort Lauderdale, FL 33309; Ruden McClosky, PA, c/o Paul S. Singerman, Esq., Berger Singerman, PA, 200 S. Biscayne Blvd., Ste. 1000, Miami, FL 33131; and United States Trustee, 51 SW First Ave., Room 1204, Miami, FL 33130, this 2nd day of November 2011.

/s/ Mariane L. Dorris

Mariane L. Dorris, Esq.