

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

FLORHAM PARK SURGERY CENTER,
LLC,

USDC
16 APR 25 PM 3:33
Case No. 16-16964-JKS
CPL

NOTICE OF APPEARANCE

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICES OF PAPERS**

PLEASE TAKE NOTICE that, pursuant to Bankruptcy Code §1109(b) and Bankruptcy Rules 2002, 3017(a), 9007 and 9010, the undersigned appears as attorneys for MMS East, LLC (“MMS East”), a creditor and party in interest herein, and requests that all notices given or required to be served in this case be served upon the following party at the following address, and that this party be added to the mailing matrix in the captioned case:

Bruce W. Bieber, Esq.
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Further, pursuant to Bankruptcy Code §1109(b), the request set forth above includes the notices and all other papers mentioned or described in Bankruptcy Rules 2002, 3017(a) and 9010(b) and the Bankruptcy Rules referenced or incorporated in Bankruptcy Rules 2002, 3017(a) and 9010(b), and also includes, without limiting the generality of the foregoing request, all plans of reorganization and disclosure statements and objections relating thereto, orders, pleadings, motions, applications, complaints, demands, hearings, requests for hearings, petitions, answers, replies, responses, memoranda and briefs in support of any of the foregoing and any other

paper or document brought before or filed with the Court with respect to these cases, whether formal or informal and whether filed, transmitted or conveyed by mail, e-mail, delivery, telephone, telegraph, telex or otherwise.

This Notice of Appearance and Request for Service of Papers shall not be deemed or construed to be a waiver of the rights of MMS East: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in these cases or in any case, controversy of proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) or any other rights, claims, actions, setoffs, or recoupments to which MMS East is or may be entitled, in law or in equity, all of which rights, claim, actions, defenses setoffs, and recoupments MMS East expressly reserves.

Dated: New York, New York
April 20, 2016

ZIMMET BIEBER LLP

By: 

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