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Attorneys for Creditor
JIAN DONG

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re
FOX ORTEGA ENTERPRISES, INC.,
Debtor.

Case No. 16-40050
Chapter 7

**JIAN DONG'S REQUEST FOR SPECIAL
NOTICE AND TO BE ADDED TO THE
MASTER MAILING LIST**

**TO THE DEBTOR, DEBTOR'S ATTORNEY, THE UNITED STATES TRUSTEE AND
OTHER PARTIES IN INTEREST:**

PLEASE TAKE NOTICE that the undersigned attorneys for creditor Jian Dong requests that all matters which must be noticed to creditors, any creditors' committee, and any other party-in-interest pursuant to Rules 2002, 3017 or 9007 of the Federal Rules of Bankruptcy Procedure or any other rule of bankruptcy procedure, or any order of this court, whether sent by the court, the Debtor or any other party in this case, be sent to the undersigned pursuant to Rule 2002(g), and that the following be added to the court's master mailing list:

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Jian Dong
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Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, or suit is intended to waive Jian Dong’s right to have final orders in non-core matters entered only after de novo review by a district judge; Jian Dong’s right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; Jian Dong’s right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or any other rights, claims, actions, defenses, setoffs or recoupments to which Jian Dong is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Jian Dong expressly reserves.

Dated: March 1, 2016 LUBIN OLSON & NIEWIADOMSKI LLP

By: /s/ Dennis D. Miller
Dennis D. Miller
Attorneys for Creditor
Jian Dong

1 **PROOF OF SERVICE**

2 I, Catherine Montoya, declare:

3 I am a citizen of the United States and employed in San Francisco County, California. I
4 am over the age of eighteen years and not a party to the within-entitled action. My business
5 address is Transamerica Pyramid, 600 Montgomery Street, 14th Floor, San Francisco, California
94111. On March 2, 2016, I served a copy of the within document(s):

6 **JIAN DONG'S REQUEST FOR SPECIAL NOTICE AND TO
7 BE ADDED TO THE MASTER MAILING LIST**

8 ☒ (BY NEF) To be served by the Court Via Notice of Electronic Filing ("NEF"):
9 Pursuant to controlling General Orders(s) and Local Bankruptcy Rule(s) ("LBR"),
10 the foregoing document will be served by the court via NEF to all those person(s)
11 listed on the Electronic Mail Notice List.

12 ☒ (BY MAIL) by placing the document(s) listed above in a sealed envelope with
13 postage thereon fully prepaid, in the United States mail at San Francisco,
14 California addressed as set forth below.

15 Stephen D. Finestone
16 Law Offices of Stephen D. Finestone
456 Montgomery Street, 20th Fl.
San Francisco, CA 94104
Tel: (415) 421-2624
Email: sfinestone@pobox.com

Attorneys for Debtor
Fox Ortega Enterprises, Inc.

17 ***Trustee***
18 Michael G. Kasolas
19 P.O. Box 26650
San Francisco, CA 94126

U.S. Trustee
Office of the U.S. Trustee/Oakland
1301 Clay Street, #690N
Oakland, CA 94612

20 I am readily familiar with the firm's practice of collection and processing correspondence
21 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
22 day with postage thereon fully prepaid in the ordinary course of business. I am aware that on
23 motion of the party served, service is presumed invalid if postal cancellation date or postage
24 meter date is more than one day after date of deposit for mailing in affidavit.

25 I declare that I am employed in the office of a member of the bar of this court at whose
26 direction the service was made.

27 Executed on March 2, 2016, at San Francisco, California.

28 /s/ Catherine Montoya

Catherine Montoya