

Ogonna Brown, Esq.
Nevada Bar No. 7589
LEWIS ROCA ROTHGERBER CHRISTIE LLP
3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169
Tel: 702.949.8200
Fax: 702.949.8398
Email: OBrown@lrrc.com

E-Filed on January 9, 2020

Attorneys for Creditor FBF Ohio LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

Case No.: BK-S-19-15959-MKN

Jagged Peak,

Chapter 11

☐ Affects this Debtor.

**LEAD CASE
JOINTLY ADMINISTERED WITH:**

In re:

Case No.: BK-S-19-15960-MKN

TradeGlobal, LLC, a Delaware limited liability company,

Chapter 11

☒ Affects this Debtor.

In re:

Case No.: BK-S-19-15961-MKN

TradeGlobal North America Holding, Inc., a Delaware corporation,

Chapter 11

☐ Affects this Debtor.

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE
AND COPIES OF ALL PLANS AND
DISCLOSURE STATEMENTS [F.R.B.P.
9010(b), 2002 AND 3017(a)]**

Ogonna M. Brown, Esq. of the law firm of Lewis Roca Rothgerber Christie LLP, attorneys for FBF Ohio LLC (“FBF,” or “Creditor”), hereby enters its appearance on the record in the above-entitled bankruptcy proceeding pursuant to Bankruptcy Rule 9010(b), and pursuant to Bankruptcy Rule 2002 and 3017(a) hereby requests special notice of all hearings, actions, contested matters, and adversary proceedings in this case, together with copies of all notices, pleadings, motions, responses, and other related materials that are issued or filed in connection with these proceedings by the Court, Debtor, the Chapter 11 Trustee other parties in interest, including copies of all plans

1 of reorganization and disclosure statements. All notices and copies in response to the foregoing,
 2 and, pursuant to Bankruptcy Rule 2002, all notices required to be mailed to FBF pursuant to
 3 Bankruptcy Rule 2002, should be directed to:

4 Ogonna M. Brown, Esq.
 5 Lewis Roca Rothgerber Christie LLP
 3993 Howard Hughes Pkwy, Suite 600
 6 Las Vegas, NV 89169-5996

7 Neither this paper nor any subsequent appearance, pleading, claim, proof of claim,
 8 document, suit, motion, nor any other writing or conduct, shall (i) expressly or impliedly designate
 9 the undersigned as agent for service of process on FBF, or (ii) constitute a waiver of any of the
 10 following rights of FBF:

11 (a) Right to have any and all final orders in any and all non-core matters entered only
 12 after *de novo* review by United States District Court Judge;

13 (b) Right to trial by jury in any proceeding as to any and all matters so triable herein,
 14 whether or not the same be designated legal or private rights, or in any case, controversy or
 15 proceeding relating hereto, notwithstanding the designation *val non* of such matters as “core
 16 proceedings” pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to
 17 statute or the United States Constitution;

18 (c) Right to have the reference of this matter withdrawn by the United States District
 19 Court in any matter or proceeding subject only to mandatory or discretionary withdrawal; and

20 (d) Other rights, claims, actions, defenses, setoffs, recoupments, or other matters to
 21 which this party is entitled under any agreements or at law or in equity or under the United States
 22 Constitution.

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1 All of the above rights are expressly reserved and preserved unto FBF without exception
2 and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any
3 other participation in the above-captioned case and ancillary proceedings.

4 DATED this 9th day of January, 2020.

5 LEWIS ROCA ROTHGERBER CHRISTIE
6 LLP

7
8 By: /s/ Ogonna Brown

9 Ogonna Brown, Esq.
10 Nevada Bar No. 7589
11 3993 Howard Hughes Parkway, Suite 600
12 Las Vegas, NV 89169
13 Tel.: 702.949.8200
14 Fax: 702.949.8398
15 Email: obrown@lrrc.com
16 Email: abrantley@lrrc.com

17 *Attorneys for Creditor FBF Ohio LLC*
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3993 Howard Hughes Parkway, Suite 600
Las Vegas, NV 89169

Lewis Roca
ROTHGERBER CHRISTIE

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Lewis Roca Rothgerber Christie LLP, and that on the 9th day of January, 2020, I caused to be served a true and correct copy of **NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE AND COPIES OF ALL PLANS AND DISCLOSURE STATEMENTS [F.R.B.P. 9010(b), 2002 AND 3017(a)]** in the following manner:

☒ (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

☐ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

/s/ Kennya Jackson

An employee of Lewis Roca Rothgerber
Christie LLP