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3 **A Professional Law Corporation**
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8 Attorneys for Landlord, GGF HUNTINGTON, LLC, a
9 California limited liability company

10 **UNITED STATES BANKRUPTCY COURT**
11 **SOUTHERN DISTRICT OF NEW YORK**
12 **MANHATTAN DIVISION**

13 In re
14 JENNIFER CONVERTIBLES, INC.
15 Debtors.

Case No. 10-13779-alg

Chapter 11

**REQUEST FOR SPECIAL NOTICE,
SERVICE OF PAPERS AND
RESERVATION OF RIGHTS**

[No Hearing Required]

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21 **TO THE CLERK OF THE COURT AND TO ALL INTERESTED PARTIES:**

22 **PLEASE TAKE NOTICE** that pursuant to Rules 2002, 3017, 4001, 9007 and 9010(b) of
23 the Federal Rules of Bankruptcy Procedure, Landlord, **GGF HUNTINGTON, LLC, a California**
24 **limited liability company** requests that notice of all matters in the above-captioned case which
25 require notice to creditors, or to other parties in interest including, without limitation, all notices
26 and papers referred to in Federal Rules of Bankruptcy Procedure 2002, 4001 and 9007, and
27 additionally including, without limitation, copies of any orders, applications, and notices thereof,
28 complaints, demands, hearings, motions, petitions, pleadings or requests (whether for relief from

1 stay, adequate protection, or any other documents relating to adversary proceedings or otherwise),
2 any other documents brought before the Court in these cases, whether formal or informal, and
3 notices thereof, complaints, demands, hearings, motions, petitions, pleadings or requests (whether
4 for relief from stay, adequate protection, or any other documents relating to adversary proceedings
5 or otherwise), any other documents brought before the Court in these cases, whether formal or
6 informal, and other matters, whether written or oral, and whether transmitted or conveyed by mail,
7 delivery, facsimile, telephone or otherwise, be sent to counsel for Landlord, **GGF**

8 **HUNTINGTON, LLC, a California limited liability company** as follows:

9 Ian S. Landsberg, Esq.
10 Landsberg & Associates
11 A Professional Law Corporation
12 16030 Ventura Boulevard, Suite 470
13 Encino, California 91436
14 Telephone: (818) 705-2777
Facsimile: (818) 705-3777

15 Request is made that the Clerk of the Court and all parties in interest to which this Request
16 for Special Notice is being mailed, place the foregoing name and address on any mailing matrix or
17 list of creditors to be prepared or existing in this proceeding. Neither this Request for Notice nor
18 any subsequent appearance, pleading, claim, proof of claim, document, suit, motion nor any other
19 writing or conduct, shall constitute a waiver of Landlord, **GGF HUNTINGTON, LLC**:

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

22 (b) Right to a trial by jury in any case, controversy or proceeding as to any and
23 all matters so triable, notwithstanding the designation *vel non* of such matters as "core proceedings"
24 pursuant to 28 U.S.C. § 157(b)(2), and regardless of whether such jury trial is pursuant to statute or
25 the United States Constitution;

26 (c) Right to have the reference withdrawn by the United States District Court in
27 any manner or Proceeding subject to mandatory or discretionary withdrawal; and

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1 (d) Other rights, claims, actions, defenses, setoffs, recoupments or other matters
2 to which **GGF HUNTINGTON, LLC, a California limited liability company**, is entitled under
3 any agreements or at law or in equity or under the United States Constitution.

4 All of the above rights are expressly reserved by **GGF HUNTINGTON, LLC, a**
5 **California limited liability company**, without exception, and without conceding jurisdiction in
6 any way by this filing or by any other participation in this bankruptcy case.

7 Dated: July 27, 2010

LANDSBERG & ASSOCIATES
A Professional Law Corporation

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10 By: /s/ Ian S. Landsberg
11 Ian S. Landsberg
12 Attorneys for Landlord,
13 GGF HUNTINGTON, LLC, a California limited
14 liability company
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CERTIFICATE OF SERVICE

I, Rebeca Benitez, hereby certify that on the 27th day of July 2010, I caused a copy of the following document(s) to be served on the individuals on the attached service list by (i) the United States first class mail, postage prepaid, on the parties listed, (ii) by e-mail on the parties who receive electronic notice in this case pursuant to the Court’s ECF filing system, and (iii) by transmitting a true copy of the foregoing document(s) via email from this firm’s email address, to each interested party set forth below or on the attached mailing list. Said transmission(s) were completed on the aforesaid date:

**“REQUEST FOR SPECIAL NOTICE, SERVICE OF PAPERS
AND RESERVATION OF RIGHTS”**

I declare under penalty of perjury that the foregoing is true and correct. Executed this 27th day of July 2010 at Encino, California.

Rebeca B. Benitez

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SERVICE LIST

Via U.S. First Class Mail and E-mail

Counsel for the Debtor

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Office of the United States Trustee

Nazar Khodorovsky
United States Trustee
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New York, NY 10004

Claims and Noticing Agent

BMC Group, Inc., Claims Agent
444 N. Nash Street
El Segundo, CA 90245

US Bankruptcy Court

Southern District of New York
Manhattan Division
Honorable Allan L. Gopper
One Bowling Green
New York, NY 10004-1408