IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: **LIMETREE BAY SERVICES, LLC, *et al.*,[1]** **Debtors.**	**CHAPTER 11** **CASE NO.: 21-32351 (DRJ)** **(Jointly Administered)**
LIMETREE BAY REFINING, LLC, **Plaintiff,** **v.** **BEECHER COTTON, PAMELA COLON, SIRDINA ISAAC-JOSEPH, ESTHER CLIFFORD, SYLVIA BROWNE, ALVINA JEAN-MARIE ILARRAZA, FRANCIS E. CHARLES, THERESA J. CHARLES, HELEN SHIRLEY, ANISHA HENDRICKS, CRISTEL RODRIGUEZ, JOSIE BARNES, ARLEEN MILLER, ROSALBA ESTEVEZ, ISIDORE JULES, JOHN SONSON, VIRGINIE GEORGE, CLIFFORD BOYNES, CHRISTOPHER CHRISTIAN, MARGARET THOMPSON, DELIA ALMESTICA, CARLOS CHRISTIAN, ANNA REXACH-CONSTANTINE, MERVYN CONSTANTINE, NEAL DAVIS, EDNA SANTIAGO, GUIDRYCIA WELLS, O'SHAY WELLS, AARON G. MAYNARD, VERNE MCSWEEN, ROCHELLE GOMEZ, MYRNA MATHURIN, JOAN MATHURIN, LEOBA JOHN BAPTISTE, WARRINGTON CHAPMAN, AND ANNE MARIE JOHN BAPTISTE,** **Defendants.**	**ADV. PRO. 21-03791 (DRJ)**

[1] The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC (1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors' mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned counsel hereby enters his appearance for Non-Debtor Freepoint Commodities LLC ("**Freepoint**") in the above-referenced adversary proceeding (the "**Adversary Proceeding**") pursuant to section 1109(b) of title 11 of the United States Code (the "**Bankruptcy Code**") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedures (the "**Bankruptcy Rules**"), and requests that copies of all notices and pleadings filed with regard to the Adversary Proceeding pursuant to Bankruptcy Rules 2002 and 3017(a) prior to and subsequent to this date be served on the undersigned via email at aherskowitz@stroock.com.

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the forgoing requests apply to and include not only the notices and papers referenced in the Bankruptcy Rules and Bankruptcy Code, but also include, without limitation, all orders, notices, and pleadings relating to any application, motion, petition, objection, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, courier services, hand delivery, facsimile transmission, electronic mail, telex, or otherwise filed with regard to the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that Freepoint does not, by filing this Notice of Appearance and Request for Services of Papers or any subsequent appearance, pleading, claim or suit, submit to the jurisdiction of the Bankruptcy Court or intend that this Notice of Appearance and Request for Service of Papers constitutes a waiver of any of its rights: (i) to have final orders in non-core matters entered only after *de novo* review by a U.S. District Court; (ii) to trial by jury in any proceeding so triable in the Adversary Proceeding; (iii) to have a U.S. District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (iv)

any other rights, claims, actions, setoffs or recoupments to which Freepoint may be entitled, in law or in equity, whether in the Adversary Proceeding, these chapter 11 cases, or otherwise, all of which rights, claims, actions, defenses, setoffs or recoupments Freepoint expressly reserves in all respects.

Dated: September 2, 2021

Respectfully submitted,

/s/ Arthur J. Herskowitz

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of September, 2021, the foregoing NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to those parties registered to receive electronic notices.

/s/ Arthur J. Herskowitz