

**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,**

ADV. PRO. 21-03791 (DRJ)

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.

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 represent investment funds and accounts managed by EIG Management Company, LLC or its affiliates that have invested in certain of the indirect equity interests in the above-captioned debtors and debtors in possession (collectively, “EIG”) in the above-referenced adversary proceeding (the “**Adversary Proceeding**”), and hereby enter their appearance 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 Procedure (the “**Bankruptcy Rules**”) and request copies of all notices and pleadings filed with regard to the Adversary Proceeding pursuant to Bankruptcy Rules 2002 and 3017(a). All such notices should be addressed as follows:

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing 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 EIG does not, by filing this Notice of Appearance and Request for Service 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 EIG 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 EIG expressly reserves in all respects.

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Dated: August 16, 2021

Respectfully submitted,

By: /s/ Gregory F. Pesce
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Attorneys for EIG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this day, the foregoing document was electronically filed with the Clerk of the Court using CM/ECF. I further certify that the foregoing document is being served this day via transmission of Notices of Electronic Filing on those parties registered to receive electronic notices

By: /s/ Gregory F. Pesce
Gregory Pesce