

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re)
)
METALDYNE CORPORATION, *et al.*,)
)
)
Debtors.)
)
)

CASE NO. 09-13412 (MG)
CHAPTER 11
(Jointly Administered)

NOTICE OF ENTRY OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned attorney of the law firm of McCarthy, Lebit, Crystal & Liffman Co., L.P.A. hereby enters her appearance as counsel for Fremar Industries, Inc. (“Fremar”), a creditor in the above-captioned case, and, pursuant to Bankruptcy Rules 2002, 9007 and 9010, requests that all notices given or required to be given in the case and all papers served or required to be served in the case, be given to and served upon the undersigned at the following office address, facsimile number and telephone number:

KIMBERLY A. BRENNAN, ESQ.
MCCARTHY, LEBIT, CRYSTAL & LIFFMAN CO., L.P.A.
101 West Prospect Avenue, Suite 1800
Cleveland, Ohio 44115
Telephone: (216) 696-1422
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request,

complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile transmission or otherwise filed with regard to the above-referenced bankruptcy proceeding.

The Entry of Appearance and Request for Service of Papers is without prejudice to Fremar's rights, remedies and claims against other entities or any objection that may be made to the jurisdiction or venue of the Court or venue of this case, and shall not be deemed or construed to be a waiver of Fremar's rights (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) or any other rights, claims, actions, setoffs, or recoupments to which Fremar is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Fremar expressly reserves.

PLEASE TAKE FURTHER NOTICE, that Fremar hereby requests notice of any proposed abandonment or of abandonment proceedings.

Respectfully submitted,

/s/ Kimberly A. Brennan
Kimberly A. Brennan (#0061625)
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*Attorney for Creditor, Fremar Industries,
Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Notice Of Entry of Appearance And Request For Service of Papers* is being filed electronically on the 15th day of June, 2009. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties not receiving service through the Court's electronic filing system will be served by regular U.S. mail. Parties may access this filing through the Court's system.

/s/ Kimberly A. Brennan
Kimberly A. Brennan (#0061625)

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