

)	
In re:)	Chapter 11
)	
ORECK CORPORATION,)	Case No. 3:13-bk-04006
)	
Debtor.)	
)	

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PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core 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 recoupments to which KWG is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: May 9, 2013

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

/s/ Ileana M. Hernandez
Manatt, Phelps & Phillips, LLP
Ivan L. Kallick, Esq.
Ileana M. Hernandez, Esq.
11355 W. Olympic Boulevard
Los Angeles, California 90064
Tel: 310-312-4000
Fax: 310-312-4224
Email: ikallick@manatt.com
ihernandez@manatt.com

Counsel for Karlen Williams Graybill Advertising, Inc.

CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Manatt, Phelps & Phillips, LLP, 11355 W. Olympic Boulevard, Los Angeles, California 90064.

On May 9, 2013, I served the foregoing document described as **REQUEST FOR SPECIAL NOTICE** on the interested parties in this action by placing a true and correct copy of this document thereof, enclosed in a sealed envelope, addressed as follows:

SEE ATTACHED SERVICE LIST

(X) (BY COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")) - See attached service list) Pursuant Local Bankruptcy Rules ("LBR"), the foregoing document will be served by the court via NEF and hyperlink to the document. On May 9, 2013, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated.

() (BY MAIL) - See attached service list) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

() (BY ELECTRONIC MAIL) - See attached list) By transmitting electronically to the parties at the email address indicated above. To the best of my knowledge the transmission was reported as complete and I did not receive a notice of failure of receipt of each such documents.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on May 9, 2013, at Los Angeles, California.

/s/ Nancy Tokuda
Nancy Tokuda

ECF SERVICE LIST

Debtor's Counsel

Alexandra E. Dugan, Esq.
William L. Norton, III, Esq.
Bradley Arant Boult Cummings LLP
1600 Division Street, Suite 700
Nashville, TN 37203
Email: adugan@babbc.com
bnorton@babbc.com

U.S. Trustee

Office of the U.S. Trustee
Beth Roberts Derrick
Charles M. Walker
701 Broadway, Suite 318
Nashville, TN 37203-3966
Email: ustpreion08.na.ecf@usdoj.gov
beth.r.derrick@usdoj.gov
charles.walker@usdoj.gov