

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
|---------------------------|---|----------------------|
| IN RE: |) | CHAPTER 11 |
| |) | |
| ORECK CORPORATION, et al. |) | CASE NO. 13-04006 |
| |) | Jointly Administered |
| DEBTOR(S). |) | |
| _____ |) | |

NOTICE OF APPEARANCE AND REQUEST FOR ALL NOTICES

PLEASE TAKE NOTICE that Ellen B. Vergos and Daniel I. Waxman and the law firm of Wyatt, Tarrant & Combs, LLP hereby enter their appearance as bankruptcy counsel for, and Behram V. Parekh and the law firm of Kirtland & Packard, LLP, hereby enter their appearance as lead counsel for plaintiffs Linda Gonzalez, Gina Chenier, Gaya Yosri, Scott Stiepleman, Greg Ruscitti, Teri Latta, and Edward Paragin (the “Lead Plaintiffs”) and all others similarly situated, including without limitation, the class of persons and entities (the “Putative Class”) represented, or sought to be represented, in the consolidated class action entitled *In re: Oreck Corporation Halo Vacuum and Air Purifiers Marketing and Sales Practices Litigation*, filed in the United States District Court for the Central District of California, MDL Case No. 2:12-ML-02317-CAS-JEM.

The above-listed counsel request that copies of all pleadings and other papers (however designated) filed in this case, as well as notices given or required to be given in this case, be given and served upon the undersigned at the addresses listed below.

In addition, it is requested that, pursuant to Rule 2002(g) of the Federal Rules of Bankruptcy Procedure, the following be added to the Court’s Mailing Matrix:

Ellen B. Vergos
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Dr., Suite 800
Memphis, TN 38120
Telephone: 901-537-1000
Fax: 901-537-1010
E-mail: evergos@wyattfirm.com

and

Daniel I. Waxman
WYATT, TARRANT & COMBS, LLP
250 West Main Street, Suite 1600
Lexington, KY 40507
Telephone: (859) 233-2012
Facsimile: (859) 259-0649
E-mail: Lexbankruptcy@wyattfirm.com

and

Behram V. Parekh
KIRTLAND & PACKARD, LLP
2041 Rosecrans Avenue, Third Floor
El Segundo, California 90245
Telephone: (310) 536-1000
Facsimile: (310) 536-1001
E-mail: bvp@kirtlandpackard.com

PLEASE TAKE FURTHER NOTICE that pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, the foregoing request includes, without limitation, all orders and notices, including but not limited to, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statements of affairs, operating reports and plans, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, hand delivery, telephone, fax, electronic mail, or otherwise.

This Notice of Appearance shall not constitute a submission by the Lead Plaintiffs, the Putative Class, or any other person or entity to the jurisdiction of the Bankruptcy Court, and without limiting the generality of the foregoing, neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive any right of the Lead Plaintiffs, the Putative Class, or any other person or entity: (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 mandatory or discretionary withdrawal, (4) to contest that jurisdiction or venue in this Court is improper or inappropriate, or (5) with respect to any other rights, claims, actions, defenses, setoffs or recoupments that may be available in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

FURTHER, if any limited service lists are used in these proceedings the undersigned requests inclusion thereon.

Dated: September 20th, 2013

Respectfully submitted,

/s/ Ellen B. Vergos

Ellen B. Vergos (TN 004133)
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Dr., Suite 800
Memphis, TN 38120
Telephone: 901-537-1000
Fax: 901-537-1010
email: evergos@wyattfirm.com

and

Daniel I. Waxman (KY 92736)
WYATT, TARRANT & COMBS, LLP
250 West Main Street, Suite 1600
Lexington, KY 40507
Telephone: (859) 233-2012
Facsimile: (859) 259-0649
E-mail: Lexbankruptcy@wyattfirm.com

**COUNSEL FOR THE LEAD PLAINTIFFS
AND THE PUTATIVE CLASS**

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of September, 2013, I electronically filed the foregoing Notice of Appearance with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all parties designated to receive electronic service including the parties listed below.

Alexandra E. Dugan
Bradley Arant Boult Cummings, LLP
1600 Division Street, Suite 700
Nashville, TN 37203

William L. Norton, III.
Bradley Arant Boult Cummings LLP
PO Box 340025
Nashville, TN 37203

Office of the U.S. Trustee
Beth Roberts Derrick
Lloyd E. Mueller
Charles M. Walker
701 Broadway, Suite 318
Nashville, TN 37203

Daniel Hays Puryear
Puryear Law Group
102 Woodmont Blvd., Suite 520
Nashville, TN 37205

Robin Bicket White
Frost Brown Todd LLC
The Pinnacle at Symphony Place
150 3rd Avenue South, Suite 1900
Nashville, TN 37201

I further certify that on the 20th day of September, 2013, I mailed a true and correct copy of the foregoing document and the notice of electronic filing by first-class, postage prepaid U.S. mail to the party listed below:

Oreck Corporation
565 Marriott Dr., Suite 300
Nashville, TN 37214

/s/ Daniel I. Waxman
Daniel I. Waxman

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