

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re: : Case No. 04-13638 (rdd)  
: Chapter 11  
RCN Corporation, et al, :  
: (Jointly Administered)  
: :  
Debtors. :  
: :  
-----X

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF  
PAPERS FOR NORTEL NETWORKS INC.**

**PLEASE TAKE NOTICE**, that Eric D. Statman of the law firm of Lovells, hereby enters his appearance in the above-captioned cases as counsel for Nortel Networks Inc. ("Nortel").

1. Pursuant to Rules 2002, 3017, 9007 and 9014 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §§342 and 1109(b), Nortel requests that all notices given or required to be given in these cases, and that all papers served in these cases be given to and served upon:

Eric D. Statman  
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2. The foregoing request includes not only the notices and papers referred to in 11 U.S.C. §1109 (b) and in the Federal Rules of Bankruptcy Procedure, but includes, without limitation, orders, *ex parte* orders, proposed orders and notices of any application, motion, petitions, pleadings, monthly operating reports, requests, complaints, or demands, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail,

delivery, telephone, telegraph, facsimile or otherwise, which affect the Debtors, the property of the estates or the administration of the Debtors' estates.

3. This Notice of Appearance shall not be deemed or construed to be a waiver of Nortel's rights: (1) to have final orders in non core matters entered only after *de novo* review by the United States District Court Judge; (2) to trial by jury in any proceedings so triable in these cases, or controversy or proceeding related to these cases; (3) to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (4) to have its claims or other rights adjudicated pursuant to any rights of arbitration; or (5) to any other rights, claims, actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions defenses, setoffs, and recoupments Nortel expressly reserves.

Dated: New York, New York  
July 13, 2004

LOVELLS

By: /s/Eric D. Statman  
Eric D. Statman (ES-8544)  
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(212) 909-0609  
Attorney for Nortel Networks Inc.

**SERVICE LIST**

By First Class Mail:

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