

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

FILED

2012 JAN 18 AM 11:12

US BANKRUPTCY COURT
CLERK
DISTRICT OF DELAWARE

IN RE:

UBI Liquidating Corp., et al

Debtors

CASE NO. 10-13005

CHAPTER 11

**NOTICE OF APPEARANCE ON BEHALF OF THE MUNICIPALITY OF
BAYAMÓN, PUERTO RICO, AND REQUEST FOR LEAVE TO FILE PROOF
OF CLAIM**

TO THE HONORABLE COURT:

Come the defendants, through their undersigned attorney, and respectfully **STATE**
and PRAY:

1. The undersigned attorneys' law firm has been retained to represent creditor
Municipality of Bayamón, Puerto Rico, in the above captioned matter.

2. We hereby request that any correspondence addressed to the Municipality of
Bayamón be mailed to the following address:

Aldarondo & López Bras
ALB Plaza
#16 Carr.199
Suite 400
Guaynabo, P.R. 00969
Tel. 787-474-5447
Fax. 787-474-5451

E-mail: icastro@alblegal.net; albimc@onelinkpr.net; alb@alblegal.net;

3. Upon review of the case docket in the Pacer Electronic Docket System, the undersigned found that the deadline to file proofs of claims for governmental units such as the Municipality of Bayamón, was March 21, 2011.

4. However, upon the information received from the Municipality of Bayamón, the first document received by it concerning the above captioned case was a *Notice of Effective Date, Administrative Bar Date, Rejection Claims Bar Date, and Final Fee Application Deadline*, dated December 1, 2011 and received at the Municipality on December 20, 2011. No other document serving notice of the case was received thereat.

5. Consequently, the Municipality did not have prior notice of having to file a Proof of Claim on or before March 21, 2011. That information came to its knowledge upon the undersigned's review of the electronic docket after the case was referred by the Municipality.

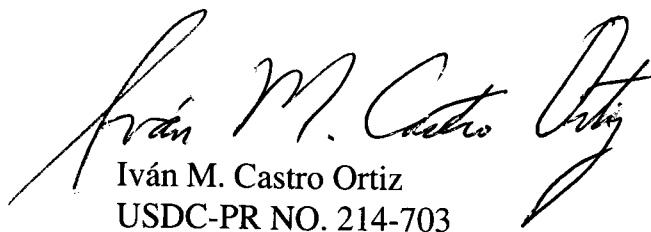
6. Based on the foregoing, the undersigned respectfully requests from this Honorable Court to allow the Municipality of Bayamón to file a Proof of Claim at this time.

7. Enclosed is said Proof of Claim along with the evidence to sustain said claim.

WHEREFORE: Respectfully, we are requesting from this Court to take notice of the above and accept the undersigned's appearance as attorneys of record.

IT IS HEREBY CERTIFIED: that a copy of this motion has been sent to debtor's counsel of record.

In Guaynabo, Puerto Rico, this January 12, 2011.



Iván M. Castro Ortiz
USDC-PR NO. 214-703

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