

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov**

In re:
ADINATH CORP,

Case No.: 15-16885-LMI

Chapter 11

Debtor

**NOTICE OF APPEARANCE
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that the undersigned hereby appears for Southern Plaza, LLC, (“Client”), a creditor and/or party-in-interest, and under, *inter alia*, Bankruptcy Rules 2002 and 9007 and Section 1109(b) of the Bankruptcy Code, 11 U.S.C. § 1109(b), requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon the undersigned.

PLEASE TAKE NOTICE that under Section 1109(b) of the Bankruptcy Code, this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleadings, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including Client, with respect to: (a) the debtor; (b) property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct by Client.

PLEASE TAKE NOTICE that Client intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive (1) Client's right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (2) Client's right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) Client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, defenses, setoffs, recoupments or remedies to which Client is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, recoupments and remedies Client expressly reserves.

Dated: May 27, 2015

/s/ Alexandra D. Blye

Alexandra D. Blye

Florida Bar No. 71499

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Attorneys for Southern Plaza, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was filed on May 27, 2015 using the Court's CM/ECF system thereby serving all registered users in this case.

/s/ Alexandra D. Blye _____

Alexandra D. Blye

Attorney