

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1

John M. Agnello, Esq.
G. Glennon Troublefield, Esq.
Christopher J. Buggy, Esq.
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Tel. (973) 994-1700
Fax (973) 994-1700
jagnello@carellabyrne.com
gtroublefield@carellabyrne.com
cbuggy@carellabyrne.com

Of Counsel

James T. Bentley, Esq.
Frank P. Sabatini, Esq.
SCHULTE ROTH & ZABEL LLP
919 Third Avenue
New York, New York 10022
Tel. (212) 756-2000
Fax (212) 593-5955
james.bentley@srz.com
frank.sabatini@srz.com

*Attorneys for the Legacy Plan of the National
Retirement Fund*

In Re:

RIH ACQUISITIONS, NJ, LLC, et al.,¹

Debtors.

Chapter 11

Jointly Administered

Case No. 13-34483 (JNP)

Judge: Honorable Jerrold N. Poslusny, Jr.

**NOTICE OF APPEARANCE AND REQUEST FOR
SERVICE OF ALL NOTICES AND PLEADINGS**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number are: RIH Acquisitions NJ, LLC d/b/a The Atlantic Club Casino Hotel (1695) and RIH Propco NJ, LLC (5454).



PLEASE TAKE NOTICE that Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. (“Carella Byrne”) appears herein as attorneys for the Legacy Plan of the National Retirement Fund (“Legacy Plan”), which is a creditor in the above-captioned bankruptcy case pending in the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”). Pursuant to, *inter alia*, section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”), Carella Byrne requests, on behalf of the Legacy Plan, that all notices given or required to be given in this case, and all papers served or required to be served in these cases, be given and served upon Carella Byrne, at the office, address and telephone number set forth below and that Carella Byrne be added to the respective electronic notice and mailing matrixes on file with the Clerk of the Bankruptcy Court, as set forth below:

Christopher J. Buggy, Esq.
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Tel: (973) 994-1700
Fax: (973) 994-1744
Email: cbuggy@carellabyrne.com

PLEASE TAKE FURTHER NOTICE, that under section 1109(b) of the Bankruptcy Code, this request includes not only the notice and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, notices of and all orders, applications, motions, petitions, pleadings, requests, complaints, or demands, 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) affect or seek to affect in any way any rights or interests of any creditor or party in interest in these cases with

respect to: (a) the captioned debtor; (b) property of the estate or alleged property of the estate of the captioned debtor; or (c) property or proceeds thereof in the possession, custody, or control of others that the captioned debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by the captioned debtor.

PLEASE TAKE FURTHER NOTICE, that this Notice of Appearance includes and constitutes a request pursuant to Bankruptcy Rule 3017 to be served with each and every plan and disclosure statement which is filed herein by any person or entity.

PLEASE TAKE FURTHER NOTICE, that neither this Notice of Appearance nor any later appearance, pleading, claim or suit waives (1) the right to have final orders in noncore matters entered only after de novo review by a District Court Judge, (2) the right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any rights, claims, actions, defenses, in law, in equity, or otherwise, all of which rights, claims, actions, and defenses are expressly reserved.

CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
*Attorneys for the Legacy Plan of the
National Retirement Fund*

Dated: December 18, 2015

By: /s/ Christopher J. Buggy
John M. Agnello, Esq.
G. Glennon Troublefield, Esq.
Christopher J. Buggy, Esq.
CARELLA, BYRNE, CECCHI,
OLSTEIN, BRODY & AGNELLO, P.C.
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james.bentley@srz.com

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#588385