

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

In re

Windstream Holdings, Inc., *et al.*,

Debtors.

Chapter 11

Case No. 19-22312 (RRD)

Jointly Administered

**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE PURSUANT TO FED. R. BANKR. P. 2002**

**PLEASE TAKE NOTICE** that Gallagher Fiduciary Advisors, LLC (“**Gallagher**”), hereby appears by its counsel, Bryan Cave Leighton Paisner LLP (“**Counsel**”). Counsel hereby enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and requests that the undersigned be added to the official mailing matrix and service lists in these cases. Counsel requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or required to be given in these chapter 11 cases and copies of all papers served or required to be served in these chapter 11 cases, including but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports, pleadings, motions, applications, lists, schedules, statements, chapter 11 plans, disclosure statements and all other matters arising herein or in any related adversary proceeding, be given and served upon Gallagher



through service on Counsel, at the address, telephone number, and email addresses set forth below:

**BRYAN CAVE LEIGHTON PAISNER LLP**

Thomas J. Schell  
1290 Avenue of the Americas  
New York, NY 10104-3300  
Tel: (212) 541-2115  
Fax: (212) 541-1462  
tjschell@bclplaw.com

Brian C. Walsh  
One Metropolitan Square, 211 North Broadway, Suite 3600  
St. Louis, MO 63102  
Tel: (314) 259-2717  
brian.walsh@bclplaw.com

**PLEASE TAKE NOTICE** that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand 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, complaint or demand, motion, petition, pleading or request, and answering or reply papers filed in these cases, whether formal or informal, written or oral, and whether served, transmitted or conveyed by mail, email, hand delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this *Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002* does not confer jurisdiction over Gallagher or any of its parents, subsidiaries, affiliates or related parties; does not constitute and shall not be deemed a consent to jurisdiction by Gallagher or any of its

parents, subsidiaries, affiliates or related parties; and does not constitute and shall not be deemed a waiver of any defense based on lack of jurisdiction by Gallagher or any of its parents, subsidiaries, affiliates or related parties.

**PLEASE TAKE FURTHER NOTICE** that this *Notice of Appearance and Request for Service Pursuant to Fed. R. Bankr. P. 2002* shall not be deemed or construed to be a waiver of any of the rights of Gallagher – including, without limitation, (i) to have final orders in non-core matters entered only after *de novo* review by a higher court, (ii) to trial by jury in any proceeding so triable in this case, or any case, controversy, or adversary proceeding related to this case, or (iii) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal – or any other rights, claims, actions, defenses, setoffs, or recoupments to which Gallagher may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: May 3, 2019

Respectfully submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

By: /s/ Thomas J. Schell  
Thomas J. Schell  
1290 Avenue of the Americas  
New York, NY 10104-3300  
Tel: (212) 541-2115  
Fax: (212) 541-1462  
tjschell@bclplaw.com

*Counsel to Gallagher Fiduciary Advisors, LLC*