

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF COLORADO**

In re:)	
)	
)	Chapter 15
NILEX USA INC.)	Case No. 22-14719 KHT
)	
Debtor in Foreign Proceeding.)	

ENTRY OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that KSV Restructuring Inc., (“KSV”) as Proposal Trustee and authorized Foreign Representative of Nilex USA Inc. (“Nilex USA”), appears herein through counsel, Chad S. Caby of Lewis Roca Rothgerber Christie LLP. Pursuant to FED. R. BANKR. P. 2002 and 9007 and 11 U.S.C. §§ 102(1) and 342, KSV 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 following:

Chad S. Caby
Lewis Roca Rothgerber Christie LLP
1601 19th Street, Suite 1000
Denver, CO 80202
(303) 623-9000
ccaby@lewisroca.com

PLEASE TAKE FURTHER NOTICE that, pursuant to the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, Trustee reports, motions, objections, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether filed, transmitted or conveyed electronically, by mail, delivery, telephone, telegraph, telex, or otherwise: (1) which affect or seek to affect, in any way, any rights or interests of creditors with respect to (a) the Debtor, or (b) property or proceeds thereof in which the Debtor may claim an interest; or (2) which require or seek to require any act, delivery of any property, payment, or other conduct by Creditor.

Neither this Entry of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive (i) this party’s right to have final orders in non-core matters entered only after *de novo* review by a U.S. District Court judge; (ii) this party’s right to trial by a jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (iii) this party’s right to have a reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which this party is or may be entitled to under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments this party expressly reserves.

Respectfully submitted this 2nd day of December, 2022.

KSV RESTRUCTURING INC.,
as Proposal Trustee and authorized Foreign
Representative of Nilex USA Inc.

LEWIS ROCA ROTHGERBER CHRISTIE LLP

/s/ Chad S. Caby

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*Attorneys for KSV Restructuring Inc., as
Proposal Trustee and authorized Foreign
Representative of Nilex USA Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on December 2, 2022, a true and correct copy of the foregoing **ENTRY OF APPEARANCE AND REQUEST FOR NOTICE** was electronically filed with the Court via the CM/ECF system. All attorneys and parties identified with the Court for electronic service on the record in this case were served by electronic service in accordance with the CM/ECF system on the date of filing:

s/ Jennifer Eastin

Of: Lewis Roca Rothgerber Christie LLP