

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION

In re:	Chapter 11
THE FALLS EVENT CENTER LLC,	Case No. 18-25116
Debtor.	Honorable R. Kimball Mosier

NOTICE OF APPEARANCE AND DEMAND  
FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Aaron T. Brogdon and Christopher J. Giaimo of Squire Patton Boggs (US) LLP hereby appear as counsel for North American Bancard, LLC (“**NAB**”) in the above-captioned case pending under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”). Pursuant to Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) 2002, 9007, and 9010 and Bankruptcy Code section 1109(b), NAB requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, petitions, memoranda, affidavits, declarations, orders, or other documents, filed or entered in this case, be transmitted to:

Aaron T. Brogdon (Utah Bar No. 09796)  
Squire Patton Boggs (US) LLP  
2000 Huntington Center 41 South High Street  
Columbus, OH 43215  
Telephone: 614-365-2700  
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Email: [aaron.brogdon@squirepb.com](mailto:aaron.brogdon@squirepb.com)

-and-

Christopher J. Giaimo  
Squire Patton Boggs (US) LLP  
2550 M Street, NW  
Washington, DC 20037  
Telephone: 202-457-6000  
Facsimile: 202-457-6315  
Email: [christopher.giaimo@squirepb.com](mailto:christopher.giaimo@squirepb.com)

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral and whether transmitted or conveyed by mail, e-mail, facsimile, telephone, telegraph, telex, or otherwise filed or made with regard to the above-captioned case and proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that the undersigned intends that neither this Notice of Appearance and Demand for Service of Papers nor any later appearance, pleadings, claim or suit shall be deemed or construed to be a waiver of the rights of NAB: (1) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, actions, setoffs, or recoupments to which NAB is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments NAB expressly reserves.

*[Signature Page to Follow]*

Dated: Columbus, OH  
April 2, 2019

SQUIRE PATTON BOGGS (US) LLP

By: /s Aaron T. Brogdon

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*Counsel to North American Bancard, LLC*