

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

IN RE:

CITY OF DETROIT, MICHIGAN,

Debtor.

Case No.: 13-53846

Chapter 9

Hon. Steven W. Rhodes

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

To: United States Bankruptcy Court
211 W. Fort St., Suite 2100
Detroit, MI 48226

Please take notice that the undersigned appears as counsel for The Kales Grand Circus Park, LLC, a party-in-interest of The City of Detroit, Michigan, the above-captioned Debtor (the "Debtor"). Request is hereby made, pursuant to Title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Rules"), that all papers, pleadings, motions and applications served or required to be served in this case, be given to and served upon the undersigned.

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, facsimile, telegraph, telex or otherwise, which may affect or seek to affect in any way any rights or interests of The Kales Grand Circus Park, LLC with respect to the Debtor or any related entity, or property or proceeds thereof in which the Debtor may claim an interest.

This appearance and request for notice is without prejudice The Kales Grand Circus Park, LLC's rights, remedies and claims against other entities or any objection that may be made to the

subject matter jurisdiction of the Court and shall not be deemed or construed to submit it to the jurisdiction of the Court. All rights, remedies and claims are hereby expressly reserved, including without limitation, the making of a motion seeking abstention or withdrawal of the case or a proceeding herein.

/s/ David T. Lin
David T. Lin (P70764)
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*Attorney for The Kales Grand Circus Park,
LLC*

Dated: February 20, 2014

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Notice of Appearance was served via this Court's electronic filing upon all those participating in same on February 20, 2014.

/s/ David T. Lin.
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