

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

UNITED ROAD TOWING, INC., et al.,  
Debtors.

Chapter 11

Case No. 17-10249 (LSS)

Jointly Administered

**NOTICE OF APPEARANCE AND DEMAND  
FOR NOTICES AND SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that Gellert Scali Busenkell & Brown, LLC hereby enters their appearance on behalf of First Service Credit Union a/k/a Right Choice Credit Union (“FSCU”) in the above-captioned Chapter 11 cases, and hereby requests, pursuant to Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, Rule 2002-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and Section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in these cases be given and served upon the following at the address, telephone, and e-mail address indicated:

Ronald S. Gellert, Esq. (DE 4259)  
**Gellert Scali Busenkell & Brown, LLC**  
1201 N. Orange Street, Suite 300  
Wilmington, DE 19801  
Telephone: (302) 425-5800  
Facsimile: (302) 425-5814  
rgellert@gsbblaw.com

**PLEASE TAKE FURTHER 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 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, 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 Demand for Notices and Service of Papers shall not be construed as an appointment of any person or entity as authorized agents of FSCU, either expressly or impliedly, for purposes of receiving service of process pursuant to Rule 7004 of the Bankruptcy Rules or Rule 4 of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive FSCU's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; (iv) right to have any claims constitutionally required to be determined by the District Court be determined therein; (v) right to have any matter heard by an arbitrator; or (vi) other rights, claims, actions, defenses, setoffs or

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recoupments to which FSCU is or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: February 10, 2017

**GELLERT SCALI BUSENKELL &  
BROWN, LLC**

*/s/ Ronald S. Gellert*

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