

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF KENTUCKY
LEXINGTON DIVISION

IN RE:)	
)	
LEXINGTON BLUE, INC., et al)	
)	CASE NO. 25-50863
)	CHAPTER 11
DEBTOR)	
_____)	

ENTRY OF APPEARANCE AND REQUEST FOR NOTICE

Lisa Koch Bryant of the law firm of Tilford Dobbins & Schmidt, PLLC hereby enters her appearance as counsel for Kapitus Servicing, Inc. ("Kapitus") in the above-captioned proceeding. Pursuant to Fed. R. Bankr. P. 2002 and 9007, Kapitus requests that all notices, applications, motions, complaints, petitions, pleadings, reports, orders, and papers lodged or filed in the above-captioned proceeding, as well as all notices of any of the foregoing, be served on its counsel as follows:

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Please take further notice that Kapitus intends that neither this Entry of Appearance nor any later pleadings, claim, or suit shall waive: (1) the rights of Kapitus to have final orders in noncore matters entered only after de novo review by a district judge; (2) the rights of Kapitus to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) the rights of Kapitus to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims,

actions, defenses, setoffs, or recoupments to which Kapitus is or may be entitled under agreements in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Kapitus expressly reserves.

Respectfully submitted,

/s/ Lisa Koch Bryant

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COUNSEL FOR
KAPITUS SERVICING, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was this 8th day of July, 2025, served by electronic mail or regular mail upon the following:

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/s/ Lisa Koch Bryant

Lisa Koch Bryant