

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	Chapter 11
)	
LIMETREE BAY SERVICES, LLC, <i>et al.</i> , ¹)	Case No. 21-32351 (DRJ)
)	
Debtors.)	(Jointly Administered)

NOTICE OF APPEARANCE

PLEASE TAKE NOTICE that the undersigned hereby appear as counsel to St. Croix Energy, LLLP (“St. Croix Energy”), and pursuant to Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) 2002, 3017(a), 9007, and 9010 and 11 U.S.C. § 1109(b), request that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statements and plans of reorganization, or other documents, filed or entered in these cases, be transmitted to:

Gregg M. Galardi
Matthew M. Roose
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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Limetree Bay Services, LLC (1866); Limetree Bay Refining Holdings, LLC.(1776); Limetree Bay Refining Holdings II, LLC (1815); Limetree Bay Refining, LLC (8671); Limetree Bay Refining Operating, LLC (9067); Limetree Bay Refining Marketing, LLC (9222). The Debtors’ mailing address is Limetree Bay Services, LLC, 11100 Brittmoore Park Drive, Houston, TX 77041.

-and-

Scot Fitzgerald McChain
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5030 Anchor Way Ste. 13
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Tel: 340-773-6955
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Neither this request for notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions nor any other writings or conduct, shall constitute a waiver of St. Croix Energy's:

- a. right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;
- b. right to trial by jury in any proceeding as to any and all matters so triable herein, regardless of whether the same be designated a legal or private right, or in any case, controversy or proceeding related hereto, notwithstanding the designation *vel non* of such matters as "core proceedings" pursuant to 28 U.S.C. § 157 (b)(2), and whether or not such jury trial right is pursuant to statute or the United States Constitution;
- c. right to request that the reference be withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. other rights, claims, actions, defenses, setoffs, recoupments or other matters to which St. Croix Energy is rightly entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

* * * * *

Dated: September 14, 2021
New York, New York

Respectfully submitted,

/s/ Gregg M. Galardi

Gregg M. Galardi (*pro hac vice* admission pending)
Matthew M. Roose (*pro hac vice* admission pending)

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Counsel to St. Croix Energy, LLLP

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document was served via the Bankruptcy Court's CM/ECF System on those parties that have consented to such service on this 14th day of September, 2021.

/s/ Gregg M. Galardi

Gregg M. Galardi

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