

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION
www.flsb.uscourts.gov

In re:

IPIC THEATERS, LLC.,¹

Chapter 11 (Subchapter V)

Case No. 26-12313 (EPK)

Debtor.

**NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS
AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned case (these “Case”) on behalf of creditors BPP East Union LLC, Crocker Downtown Development Associates and Crocker Mizner Park IV, Ltd. (collectively, the “Landlords”). Pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and Section 1109(b) of the Bankruptcy Code, the Landlords request that any and all notices given or required to be given and all pleadings, motions, applications, and papers served or required to be served in this Case be delivered and served upon the following parties:

Robert L. LeHane (*pro hac vice* to be filed)
Jennifer D. Raviele (*pro hac vice* to be filed)
Connie Y. Choe
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¹ The Debtor in this case last four digits of federal identification number is 3742. The address for the Debtor is 433 Plaza Real Suite 355 Boca Raton, FL 33432.

kdwbankruptcydepartment@kelleydrye.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 Federal Rules of Bankruptcy Procedure, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile, or otherwise in this Case.

PLEASE TAKE FURTHER NOTICE that this notice of appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive any (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which the Landlords are or may be entitled to under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: March 4, 2026

KELLEY DRYE & WARREN LLP

By: /s/ Connie Y. Choe

Connie Y. Choe (Florida Bar No. 1032162)

Robert L. LeHane (*pro hac vice* to be filed)

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*Counsel for BPP East Union LLC, Crocker Downtown
Development Associates and Crocker Mizner Park IV, Ltd.*

CERTIFICATE OF SERVICE

I, Connie Choe, hereby certify that, on March 4, 2026, I caused to be served a true and correct copy of the foregoing notice of appearance on all parties on the Court's ECF notice list.

/s/ Connie Y. Choe
Connie Y. Choe