

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

_____	)	
In re:	)	Chapter 11
	)	
Wordsworth Academy, <i>et al.</i> , <sup>1</sup>	)	Case No. 17-14463 (AMC)
	)	
Debtors.	)	Jointly Administered
_____	)	

**NOTICE OF APPEARANCE AND  
REQUEST FOR SERVICE OF NOTICES**

**PLEASE TAKE NOTICE** that Siena Lending Group LLC (“Siena”), by and through its undersigned counsel, hereby appears in the above-captioned cases pursuant to Fed. R. Bankr. P. 9010(b) and requests, pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and sections 102(1) and 342 of the Bankruptcy Code, that all notices given or required to be given in these cases and all papers served or required to be served in these cases be given to and served at the following address:

Joel Charles Shapiro, Esquire  
Josef W. Mintz, Esquire  
**BLANK ROME LLP**  
One Logan Square  
130 North 18th Street  
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**PLEASE TAKE FURTHER NOTICE** that, pursuant to Fed. R. Bankr. P. 2002, the undersigned counsel hereby request copies of all papers including, without limitation, all motions, notices, applications, orders, reports, legal memoranda, exhibits and all other papers which are filed

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Wordsworth Academy (9031); Wordsworth CUA 5, LLC (0983); and Wordsworth CUA 10, LLC (5980). Wordsworth Academy has an address at 3300 Henry Ave., Philadelphia, PA 19129.

with the Court or served upon any party. All copies should be sent to the above-listed counsel by electronic mail and/or by mail to the address appearing above.

**PLEASE TAKE FURTHER NOTICE** that this request includes not only the notices and papers referred to in the United States Bankruptcy Code and the Federal Rules of Bankruptcy Procedure, but also includes, without limitation, orders and notices of any petition, pleading, complaint, hearing, application, motion, request or demand, whether formal or informal, written or oral, or whether made by mail, email, hand delivery, telephone, facsimile, or otherwise which affect or seek to affect in any way the rights or interests of any party in this matter.

**PLEASE TAKE FURTHER NOTICE** that this request pursuant to Fed. R. Bankr. P. 2002 shall not be deemed or construed to be a submission by Siena to the jurisdiction or power of this Court or a waiver of any substantive or procedural rights of Siena, including without limitation, to: (a) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (b) have final orders in non-core matters entered only after *de novo* review by the District Court; (c) a trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (d) require that where any adversary proceeding is to be initiated against Siena in these or any related cases or where any proceeding is to be initiated by complaint against Siena under applicable non-bankruptcy law, service shall be made on Siena in accordance with applicable Federal Rules of Civil Procedure and applicable non-bankruptcy law, and that service upon undersigned counsel is insufficient for such purposes; or (e) any other rights, claims, actions, defenses, setoffs or recoupments to which Siena is or may be entitled in law or at equity, all of which rights, claims, actions, defenses, setoffs or recoupments Siena expressly reserves.

Dated: August 24, 2017  
Philadelphia, Pennsylvania

**BLANK ROME LLP**

/s/ Joel Charles Shapiro  
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*Attorneys for Siena Lending Group LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 24, 2017, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Notices* to be electronically filed with the Clerk of the Bankruptcy Court, and served upon all parties registered for electronic service in the above-captioned case, using this Court's CM/ECF system.

*/s/ Joel Charles Shapiro*