

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF COLORADO

In re:)
ADAM AIRCRAFT)
INDUSTRIES, INC.,)
) Case No. 08-11751-MER
) Chapter 7
Debtor)
)
)
)
)
)
)

**NOTICE OF APPEARANCE,
REQUEST FOR SERVICE OF PAPERS,
AND RESERVATION OF RIGHTS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Portfolio Real Estate Lakewood, LLC (“Claimant”), a creditor and party in interest, and requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon:

Lino S. Lipinsky de Orlov, Esq.
McKenna Long & Aldridge LLP
1875 Lawrence Street, Suite 200
Denver, Colorado 80202
Telephone: (303) 634-4336
Facsimile: (303) 634-4400
Email: llipinsky@mckennalong.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referenced above, but also includes, without limitation, any order, notice, application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, email, telegraph, telex, or otherwise that (1) affects or seeks to

affect in any way any rights or interests of any creditor or party in interest in this case, including Claimant, with respect to, *inter alia*, the following: (a) the debtor; or (b) property of the estate, or proceeds thereof, in which the debtor may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use or claim; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct by Claimant.

PLEASE TAKE FURTHER NOTICE that Claimant intends that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive: (1) Claimant's right to have final orders in noncore matters entered only after *de novo* review by a District Judge; (2) Claimant's right to trial by jury in any proceeding so triable in this case; (3) Claimant's right 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 Claimant is or may be entitled, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Claimant expressly reserves.

Dated this 22nd day of February, 2008.

Respectfully submitted,

s/ Lino S. Lipinsky de Orlov
Lino S. Lipinsky de Orlov, No. 13339
McKenna Long & Aldridge LLP
1875 Lawrence Street, Suite 200
Denver, Colorado 80202
303-634-4000
Facsimile: 303-634-4400
Email: llipinsky@mckennalong.com

ATTORNEYS FOR CREDITOR
PORTFOLIO REAL ESTATE
LAKEWOOD, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of February, 2008, a true and correct copy of the foregoing **NOTICE OF APPEARANCE, REQUEST FOR SERVICE OF PAPERS, AND RESERVATION OF RIGHTS** was deposited in the United States mail, postage prepaid, and addressed to the following:

Jeffrey A. Weinman, Esq.
Weinman & Associates, P.C.
730 Seventeenth Street, #240
Denver, CO 80202

U.S. Trustee
999 18th Street
Suite 1551
Denver, CO 80202

M. Frances Cetrulo, Esq.
Berenbaum, Weinshienk & Eason, P.C.
370 Seventeenth St., Suite 4800
Denver, CO 80202

Jeffrey C. Krause, Esq.
Robert A. Greenfield, Esq.
Stutman, Treister & Glatt, P.C.
1901 Avenue of the Stars, 12th Floor
Los Angeles, CA 90067

Lawrence Bass, Esq.
Holme Roberts & Owen LLP
1700 Lincoln St., Suite 4100
Denver, CO 80203

John C. Smiley, Esq.
Lindquist & Vennum LLP
600 17th St., Suite 1800 South
Denver, CO 80202

Brian A. Magoon, Esq.
Robinson Waters & O'Dorisio, P.C.
1099 18th Street, Suite 2600
Denver, CO 80202

s/ Lino S. Lipinsky de Orlov

DN:32137002.1