

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

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In re:

NATHAN AND MIRIAM BARNERT
MEMORIAL HOSPITAL ASSOCIATION,

Debtor-in-Possession.

Case Nos. 07-21631-DHS

Judge: Donald H. Steckroth

Hearing Date: n/a

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

PLEASE TAKE NOTICE that Winston & Strawn LLP("W&S"), hereby appears on behalf of MBIA Insurance Corporation ("MBIA"), as a party in interest in the above-captioned case and demands, pursuant to 11 U.S.C. §§ 342 and 1109(b) and Rules 2002, 3017 and 9007 of the Federal Rules of Bankruptcy Procedure, that copies of all papers filed in the Debtor's case or in any related adversary proceedings be served on the individual at the address set forth below:

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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), the foregoing demand includes not only the notices and papers referred to or specified above but also includes, without limitation, orders and notices of any application, complaint, demand, motion, petition, plan, disclosure statement, pleading or request, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, telephone, telegraph, telex or otherwise filed or made which affect or seek to affect in any way rights or interests of MBIA, parties in interest, W&S, the Debtor or the property of the Debtor.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive or otherwise impair or limit (a) MBIA's right to have final orders in non-core matters entered only after de novo review by a District Judge, (b) MBIA's right to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (c) MBIA's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal or (d) any other rights, claims, actions, defenses, setoffs, or recoupments to which MBIA is or may

be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments MBIA expressly reserves.

WINSTON & STRAWN LLP
Attorneys for MBIA Insurance Corporation

By: /s/ James S. Richter
James S. Richter

Dated: September 4, 2007

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