

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In Re:)	Chapter 11
PRIMARY HEALTH SYSTEMS, INC., et al.,)	Case No. 99-615 (MFW)
Debtor.)	Jointly Administered

**ENTRY OF APPEARANCE
AND REQUEST FOR ALL NOTICES AND DOCUMENTS**

PLEASE ENTER the appearance of DANIEL K. HOGAN, ESQUIRE, as Counsel for Plain Dealer Publishing Company, a Delaware corporation (hereinafter "Plain Dealer"), a creditor and party-in-interest in the above-captioned case, hereby appears by its counsel, Daniel K. Hogan, Attorney at Law; such counsel hereby enters its appearance pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above captioned cases be given and served upon the following person at the following address, telephone and telecopy numbers:

Daniel K. Hogan, Esquire
1701 Shallcross Avenue, Suite C
Wilmington, Delaware 19806
Telephone: (302) 656-7540
Telecopy: (302) 656-7604

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 Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone,

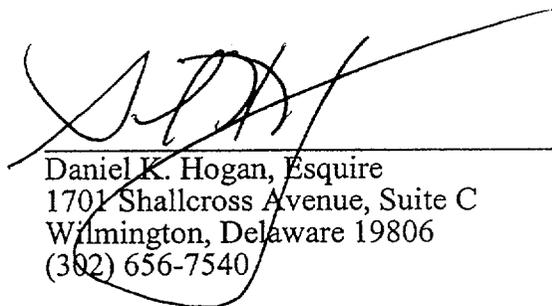
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telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of Plain Dealer's right (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceedings so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) of any other rights, claims, actions, setoffs, or recoupments to which Plain Dealer is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Plain Dealer expressly reserves.

Dated: 6/15/01



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