

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	
	§	<b>Case No. 09-38044</b>
<b>Express Energy Services Operating, LP, et al.,</b>	§	
	§	<b>Chapter 11</b>
<b>Debtors.</b>	§	
<hr/>	§	<b>Jointly Administered</b>

**NOTICE OF APPEARANCE AND REQUEST FOR  
SERVICE OF ALL PLEADINGS AND DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of chapter 11 of title 11, United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), FSP Phoenix Tower Limited Partnership (“Phoenix Tower”), creditor and party-in-interest, by and through its undersigned counsel, hereby appears in the above-captioned chapter 11 cases of Express Energy Services Operating, LP and its affiliated debtors (the “Debtors”) and requests, pursuant to Bankruptcy Rules 2002, 9007, and 9010, and section 342 of the Bankruptcy Code, that all papers, pleadings, motions, and applications served or required to be served in this case, be given to and served upon the following:

**BAKER BOTTS L.L.P.**  
910 Louisiana Street  
Houston, Texas 77002-4995  
Telephone: (713) 229-1234  
Facsimile: (713) 229-1522  
Attn: Mary Millwood Gregory  
Email: *mary.gregory@bakerbotts.com*

-and-

Donald H. Emerson  
3200 Southwest Freeway, Suite 100  
Houston, Texas 77027  
Telephone: (713) 622-6222  
Facsimile: (713) 623-8066  
Email: *don.emerson@hines.com*

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Bankruptcy Rules and the Bankruptcy Code specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by ordinary mail, hand delivery, telephone, facsimile, electronic mail, or otherwise, which may affect or seek to affect in any way any rights or interests of Phoenix Tower with respect to the Debtors' estates, or any related entities, or property or proceeds thereof in which the Debtors' estates may claim an interest.

PLEASE TAKE FURTHER NOTICE that this appearance and request for service of all pleadings and documents is without prejudice to Phoenix Tower's rights, remedies, and claims against other entities or any objection that may be made to the subject matter jurisdiction of the Court and shall not be deemed or construed to submit Phoenix Tower to the jurisdiction of the Court. This appearance shall not be deemed or construed to be a waiver of the right of Phoenix Tower (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 proceeding so triable in this case or any case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which Phoenix Tower is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Phoenix Tower expressly reserves.

Dated: December 7, 2009

**BAKER BOTTS L.L.P.**

/s/ Mary Milwood Gregory\_\_\_\_\_

Mary Millwood Gregory

State Bar No. 05556320

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Houston, Texas 77002

Telephone: 713.229.1234

Facsimile: 713.229.1522

Email: *mary.gregory@bakerbotts.com*

**COUNSEL FOR FSP PHOENIX TOWER LIMITED  
PARTNERSHIP**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of December, 2009, a true and correct copy of the foregoing **Notice of Appearance and Request for Service of all Pleadings and Documents** was served on the persons listed below, via First-Class United States Mail with sufficient postage prepaid as followed:

Akin Gump Strauss Hauer & Feld LLP Attn: C. Gibbs, C. Ketter & E. Seitz Atty for Credit Suisse 1700 Pacific Avenue, Suite 4100 Dallas, TX 75201	Akin Gump Strauss Hauer & Feld LLP Attn: J. Michael Chambers 1111 Louisiana St., 44th Floor Houston, TX 77002-5248
Alvarez & Marsal North America, LLC Attn: Todd Matherne & Dean E. Swick 700 Louisiana Street, Suite 900 Houston, TX 77002	Arkansas Employment Security Dept. P. O. Box 8007 Little Rock, AR 72203-8007
Assurance Fire, Safety & Training Attn: Natalie Hodge 2239 South Main Ave. Lovington, NM 88260	B&B Safety Services, LLC Attn: Caprice Garrett 101 Turkey Creek Trail Bridgeport, TX 76426
Baker Hughes Incorporated c/o Snow Fogel Spence LLP Attn: Christopher J. Ryan 2929 Allen Parkway, Suite 2300 Houston, TX 77019	Bassell & Wilcox, P.L.L.C. Attn: Stephen G. Wilcox Atty for Chrysler Financial Services P.O. Box 11509 Fort Worth, TX 76110
Bourque Sales & Service Inc. Attn: Natalie Mhire 114 Row 3 Lafayette, LA 70505	Bracewell & Giuliani LLP Attn: Phillip D. Sharp 711 Louisiana St., Ste. 2300 Houston, TX 77002
Bracewell & Giuliani LLP Attn: William Wood & Chris Tillmanns Atty for Darrell Brewer 711 Louisiana, Suite 2300 Houston, TX 77002	Bryan Cave LLP Attn: K. Aurzada, J. Leininger & J. Krystinik Atty for De Lage Landen Financial Serv. 2200 Ross Avenue, Suite 3300 Dallas, TX 75201

Chaffee McCall, L.L.P. Attn: Kevin P. Walters & Prisidha A. Govender Atty for General Electric Capital Corp. 815 Walker Street, Suite 953 Houston, TX 77002	Circle Monograms & Uniforms Attn: Ann Chapman 1799 Enterprise Athens, TX 75751
Cowser Tire & Service Attn: Jan Davis 1700 NE Loop 820 Ft. Worth, TX 76106	Credit Suisse As Administrative Agent for Secured Creditors Attn: Agency Group One Madison Ave. New York, NY 10010
Devlin, Naylor & Turbyfill, PLLC. Attn: R.C. Naylor & K.B. Davis Atty for Ford Motor Credit Company LLC 4801 Woodway, Suite 420 West Houston, TX 77056	Diesel Tech of Louisiana LLC Attn: Liz Bonzillan 102 Clendenning Road Houma, LA 70363
Down Hole Pressure, Inc. Attn: Richard Reaux 408 Eola Road Broussard, LA 70518	Downhole Solutions Inc. Attn: W. C. Jones 5704 East Admiral Blvd. Tulsa, OK 74115
Express Energy Services Operating, LP Attn: James Davis Phoenix Tower 3200 Southwest Freeway, Suite 2000 Houston, TX 77027	Fastenal Company Accounts Receivable Dept. 2001 Theurer Blvd. Winona, MN 55987
Federal Express Attn: LeLinda Cox 3965 Airways Blvd., Module G, 3rd Floor Memphis, TN 38116	First Bankcard Attn: Christine Klement 1620 Dodge Street Omaha, NE 68197
G&B Works Attn: William Brown 110 Rolling Hills Loop Coushatta, LA 71019	GCR Victoria Tire Center Attn: Theresa Terenio 4202 Highway 59 North Victoria, TX 77901
Glover's Truck Parts & Equipment Attn: April Harrell 1200 Baucum Industrial Dr. North Little Rock, AR 72117	HiJet Bit LLC Attn: Tim Vaughy 193 Fairview Court Decatur, TX 76234

Holiday Inn Select Attn: John Coleman 2712 Southwest Freeway Houston, TX 77098	Holloway Drilling Attn: Danielle Bodin 204 Rue Napoleon Broussard, LA 70518
Howard Johnson Inn Attn: Ken Masters 12450 South Freeway Burleson, TX 76028	Internal Revenue Service Department of the Treasury Austin, TX 73301-0014
Internal Revenue Service Attn: Insolvency Section P.O. Box 21126 Philadelphia, PA 19114-0326	Internal Revenue Service Attn: Legal Department 844 King Street Wilmington, DE 19801
Johnson Ford Lincoln Mercury Attn: Jennifer McKinney 405 Industrial Drive Minden, LA 71055	Keating Muething & Klekamp PLL Attn: Jason V. Stitt, Esq. Atty for First National Capital Corp. One East Fourth Street, Suite 1400 Cincinnati, OH 45202
King & Spalding LLP Attn: Eric M. English Atty for Valerus Compression Services 1100 Louisiana, Suite 4000 Houston, TX 77002	Knapp Chevrolet Attn: Bob Flanders 815 Houston Ave. Houston, TX 77007
Ladd Equipment Inc. Attn: Dale Reid 1304 SE 25th Street Oklahoma City, OK 73129	Linebarger Goggan Blair & Sampson, LLP Attn: David G. Aelvoet Atty for Ector Cad 711 Navarro, Suite 300 San Antonio, TX 78205
Linebarger Goggan Blair & Sampson, LLP Attn: Diane W. Sanders Terrace II, 2700 Via Fortuna Dr, Ste 400 P.O. Box 17428 Austin, TX 78760	Linebarger Goggan Blair & Sampson, LLP Attn: Elizabeth Weller Atty for Tarrant County & Northwest ISD 2323 Bryan Street, Suite 1600 Dallas, TX 75201
Linebarger Goggan Blair & Sampson, LLP Attn: John P. Dillman Atty for Wharton, Jackson & Harris County Post Office Box 3064 Houston, TX 77253	Louisiana Dept of Environmental Quality Office of Environmental Services P.O. Box 4313 Baton Rouge, LA 70821-4313

Louisiana Dept. of Taxation and Finance P. O. Box 201 Baton Route, LA 70821	Louisiana Unemployment Insurance Fund Office of Unemployment Insurance Admin. Unemployment Claims Unit P.O. Box 94094, Room 386 Baton Rouge, LA 70804-9096
Macquarie Energy Holdings LLC c/o Sidley Austin LLP Attn: James P. Seery, Jr. 787 Seventh Ave. New York, NY 10019	Mallard Oilfield Equipment, Inc Attn: Jerry Mosley 27 N. Sunnyslane Rd. Moore, OK 73160
McCreary, Veselka, Bragg & Allen, P.C. Attn: Michael Reed Atty for County of Brazos P.O. Box 1269 Round Rock, TX 78680	McNew Fabrication & Welding Attn: Terri Higgs 6 Snowden Circle Greenbrier, AR 72058
Office of the Attorney General Attn: Greg Abbott 300 W. 15 <sup>th</sup> Street Austin, TX 78701-1649	Office of the U.S. Attorney (D.N.J.) Attn: Ralph J. Marra, Jr., USA Peter Rodino Federal Building 970 Broad Street, Suite 700 Newark, NJ 07102
Office of the U.S. Attorney (E.D. LA.) Attn: Jim Letten, USA 500 Poydras Street, Room B210 New Orleans, LA 70130	Office of the U.S. Attorney (N.D. ILL.) Attn: Patrick Fitzgerald, USA 219 S. Dearborn Street, Fifth Floor Chicago, IL 60604
Office of the U. S. Attorney (TX) Attn: Tim Johnson P.O. Box 61129 Houston, TX 77208-1129	Office of the U.S. Attorney (W.D. ARK.) Attn: Deborah J. Groom, USA 414 Parker Ave Fort Smith, AR 72901-1902
Office of the U.S. Attorney (W.D. WIS.) Attn: Steve Sinnot, USA P.O. Box 1585 Madison, WI 53701-1585	Office of the United States Trustee Attn: Hector Duran Region 7 515 Rusk Street, Ste. 3516 Houston, TX 77002-2604
PA Environmental Protection Agency Rachel Carson State Office Building 400 Market Street Harrisburg, PA 17101	Pennsylvania Department of Revenue Suite 204A 110 N 8th Street Philadelphia, PA 19107-2412

Pennsylvania Sling Company Attn: Bob Negherbon 6951 Allentown Blvd. Harrisburg, PA 17112	Pennsylvania Unemployment Insurance Fund State Workers' Insurance Fund 444 North 3rd Street, 6th Floor Philadelphia, PA 19123-4186
Perdue, Brandon, Fielder, Collins & Mott Attn: Elizabeth Banda and R. Bruce Medley Atty for Johnson County and Ft. Worth ISD P.O. Box 13430 Arlington, TX 76094	Pro-Fab Equipment L.P. Attn: Brandy Clark 705 W. Kennedale Parkey Kennedale, TX 76060
Professional Safety Associates Attn: Peter Dottolo 2209 N. Padre Island Dr. Corpus Christi, TX 78408	Quilling, Selander, Cummiskey, & Lownds, P.C. Attn: Timothy A. York 2001 Bryan Street, Ste. 1800 Dallas, TX 75201
RDI Fluid Service LLC Attn: Charlene Appleby 2040 N. Highway 287 Alice, TX 78332	Red Line Instruments, Inc. Attn: James Johnson 1139 Fltecher Road Sulphur, OK 73086
Rental & Fishing Tools Inc. Attn: Jim Jones 608 Garber Road Broussard, LA 70518	Richards Kibbe & Orbe LLP Attn: Joon Hong; Nicholas Whitney Atty for Orix Finance Corp. One World Financial Center New York, NY 10281
Richards Kibbe & Orbe LLP Attn: Nicholas Whitney Attn: Douglas Plante One World Financial Center New York, NY 10281-1003	Roberts Truck Center Attn: Michelle Gann 621 Interstate Drive Ardmore, OK 73401
Rogers/Davis/Hrach, L.L.P. Attn: Brian W. Rogers, Esq. Atty for Southern Field Maintenance 121 E. Constitution Victoria, TX 77901	Scott Stevens C/O Wachovia Capital Partners 301 S. College St., 12th Floor NC0732 Charlotte, NC 28228
Secretary of State Office Attn: Hope Andrade P.O. Box 12887 Austin, TX 78711-2887	Securities and Exchange Commission Attn: Daniel M. Hawke, Regional Director The Mellon Independence Center 701 Market Street Philadelphia, PA 19106-1532

Securities and Exchange Commission Attn: James A. Clarkson, Regional Direct 3 World Financial Center, Suite 400 New York, NY 10281-1022	Securities and Exchange Commission Attn: David M. Becker, Gen. Counsel 100 F Street NE Washington, DC 20549-2000
Securities and Exchange Commission Attn: Legal Department 15th & Pennsylvania Avenue, NW Washington, DC 20020	Securities and Exchange Commission Attn: Rose L. Romero, Regional Director Burnett Plaza, Suite 1900 801 Cherry Street, Unit 18 Fort Worth, TX 76102
Shipley Motor Equipment Co. Attn: Melissa Immel 324 South Bloomington Lowell, AR 72745	Snow Fogel Spence LLP Attn: Phil F. Snow & Kenneth P. Green Atty for Baker Hughes Oilfield Opr. Inc. 2929 Allen Parkway, Suite 4100 Houston, TX 77019
Steighner Crane Services Attn: John Steighner 136 Verndale Drive Butler, PA 16002	Sullins, Johnston, Rohrbach & Magers Attn: Michael Hale Johnston 2200 Phoenix Tower 3200 Southwest Freeway Houston, Texas 77027
Summit Oilfield Services Inc. Attn: Brad Dick 211 Corporate Drive Sibley, LA 71073	Swanberg Texas, Inc. Attn: Letty Bitner 500 Dennis Street Weatherford, TX 76087
Texas Attorney General's Office Attn: J Starks, Asst Atty General C/O S. Simpson, Paralegal P.O. Box 12548 Austin, TX 78711	Texas Commission on Environmental Quality Attn: Mark R. Vickery, P.G. MC 109 - TCEQ P.O. Box 31087 Austin, TX 78711-3087
Texas Comptroller of Public Accounts Attn: Susan Combs 111 E 17th St P.O. Box 13528, Capital Station Austin, TX 78711-1440	Texas Secretary of State Attn: Hope Andrade P.O. Box 12887 Austin, TX 78711-2887
Texas State Tax Dept Attn: Susan Combs 111 E 17th St Austin, TX 78711-1440	Texas Workforce Commission Attn: Tax Department 101 E 15th St Austin, TX 78778-1442

<p>Texas Workforce Commission  Attn: Rick Diaz, Special Actions Unit  Regulatory Integrity Division, Collections  101 E 15th St, Room 556  Austin, TX 78778-0001</p>	<p>The Garden City Group, Inc.  Attn: Patrick M. Leathem  105 Maxess Road  Melville, NY 11747</p>
<p>The Garden City Group, Inc.  Attn: Eamon Mason  105 Maxess Road  Melville, NY 11747</p>	<p>The Law Offices of T.H. Kelley, P.C.  Attn: Teri H. Kelley, Esq.  Atty for John Deere Construction  6750 West Loop S., Ste 920  Bellaire, TX 77401</p>
<p>U. S. Department of Justice  Attn: Ellen Slights  1007 Orange Street  Suite 700  Wilmington, DE 19899</p>	<p>U. S. Environmental Protection Agency  Office of General Counsel  Ariel Rios Building, Rm 4000, Mail 2310A  1200 Pennsylvania Avenue, N.W.  Washington, DC 20460</p>
<p>UCTS  Attn: Joseph W. Kots  PA, Dept of Labor and Industry  625 Cherry Street - Room 203  Reading, PA 19602</p>	<p>US Attorney - Southern District  Attn: Tim Johnson  P.O. Box 61129  Houston, TX 77208-1129</p>
<p>US Attorney General (Louisiana)  Attn: Jim Letten  500 Poydras Street  Room B210  New Orleans, LA 70130</p>	<p>US Attorney General (Pennsylvania)  Attn: Michael L. Levy  615 Chestnut Street, Ste. 1250  Philadelphia, PA 19106</p>
<p>US Attorney General (Washington DC)  Attn: Channing D. Phillips  950 Pennsylvania Avenue, NW  Washington, DC 20530-0001</p>	<p>Varel International  Attn: Jonas Percolari  1434 Patton Place #106  Carrollton, TX 75007</p>
<p>Versatile Energy Services Corp.  Attn: Kent Storemoen  201 N. 15th Street #1800  Fargo, ND 58108</p>	<p>Weil Gotshal &amp; Manges LLP  Attn: Alfredo R. Perez  700 Louisiana St Ste 1600  Houston, TX 77002-2755</p>
<p>Weil Gotshal &amp; Manges LLP  Attn: Chris Lopez  700 Louisiana St Ste 1600  Houston, TX 77002-2755</p>	<p>Winstead PC  Attn: Joseph G. Epstein, Atty for Orix  1100 JP Morgan Chase Tower  600 Travis Street  Houston, TX 77002</p>

Dated: December 7, 2009

/s/ Mary Millwood Gregory

Mary Millwood Gregory