

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

AC&S ASBESTOS SETTLEMENT TRUST <i>et al.</i> ,	:	
	:	
Petitioners,	:	
	:	Miscellaneous Pleading
vs.	:	
	:	No. 23-00300 (JCW)
ALDRICH PUMP LLC and MURRAY BOILER LLC,	:	(Transferred from District of New Jersey)
	:	
Respondents,	:	
	:	
VERUS CLAIM SERVICES, LLC,	:	
	:	
Interested Party,	:	
	:	
NON-PARTY CERTAIN MATCHING CLAIMANTS,	:	
	:	
Interested Party.	:	
	:	

**MOTION FOR ADMISSION *PRO HAC VICE* FOR  
TIMOTHY P. DUGGAN**

NOW COMES Thomas W. Waldrep, Jr., an attorney and member in good standing of the North Carolina bar and admitted to practice before this Court and, pursuant to the admission requirements of Local Rule 83.1 of the United States District Court for the Western District of North Carolina, moves this Court for admittance *pro hac vice* of Timothy P. Duggan (“Applicant”) for the purposes of representing the Non-Party Certain Matching Claimants. In support of this Motion, the undersigned would respectfully show the Court the following:

1. Applicant is a Shareholder and member of Stark & Stark with offices located in New Jersey, Pennsylvania, and New York.



2. Applicant is a member in good standing and admitted to practice in the state and certain federal courts in New Jersey and New York.

3. Applicant's appearance in this matter will be in association with the undersigned, who is a member in good standing of the North Carolina State Bar and who is admitted to practice before this Court.

4. The Applicant has not been disciplined by any court or administrative body and does not have any pending disciplinary proceedings. Further, the Applicant has never had a *pro hac vice* admission or admission in any other bar revoked.

5. The Applicant understands *pro hac vice* admission is for this case only and does not constitute formal admission to the bar of this Court.

6. The Declaration of Applicant supporting this Motion is attached hereto and is incorporated herein by reference.

7. The \$288.00 fee for admission *pro hac vice* is being submitted with the filing of this Motion.

WHEREFORE, the Movant respectfully requests that this Court enter an Order admitting Timothy P. Duggan *pro hac vice* in this matter as set forth herein.

Dated: March 1, 2023.

Respectfully submitted,

**WALDREP WALL BABCOCK  
& BAILEY PLLC**

/s/ Thomas W. Waldrep, Jr.

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*Local Counsel for Timothy P. Duggan*

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	:	
NON-PARTY CERTAIN MATCHING CLAIMANTS,	:	
	:	
Interested Party.	:	

**DECLARATION OF TIMOTHY P. DUGGAN  
IN SUPPORT OF MOTION FOR  
ADMISSION *PRO HAC VICE***

Timothy P. Duggan, in support of the Motion for Admission *Pro Hac Vice*, declares as follows:

1. I am a Shareholder and member of Stark & Stark, 993 Lenox Drive, Lawrenceville, NJ 08648. My telephone number is (609) 895 - 7353, and my email address is tduggan@stark-stark.com.

2. I am admitted to practice in the state and certain federal courts in New Jersey and New York.

3. I am in good standing in all courts where I have been admitted.
4. I have never been disbarred, suspended, or denied admissions to practice.
5. I declare under the penalty of perjury that the foregoing is true and correct.

This the 1st day of March, 2023.

/s/ Timothy P. Duggan  
Timothy P. Duggan, Declarant

**CERTIFICATE OF SERVICE**

I hereby certify that on this day, the foregoing Motion for Admission to Practice *Pro Hac Vice* and Declaration of Timothy P. Duggan were served by electronic means on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case.

Dated: March 1, 2023.

**WALDREP WALL BABCOCK  
& BAILEY PLLC**

/s/ Thomas W. Waldrep, Jr.

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*Local Counsel for Timothy P. Duggan*