

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC and MURRAY  
BOILER LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-30608

**MOTION FOR ADMISSION *PRO HAC VICE* FOR VALERIE E. ROSS**

I, Garland S. Cassada, am a partner with the law firm of Robinson, Bradshaw & Hinson, P.A. and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the “Local Bankruptcy Rules”) and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Valerie E. Ross to practice in this Court for the purpose of representing DBMP LLC, in the above-captioned case. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Valerie E. Ross is a partner of the law firm of ArentFox Schiff with her office located at 1717 K Street NW, Washington, DC 20006. Ms. Ross’s telephone number is (202) 778-6453, and her facsimile number is (202) 857-6395. Ms. Ross’s e-mail address is [valerie.ross@afslaw.com](mailto:valerie.ross@afslaw.com).

<sup>1</sup> The last four digits of the Debtors’ taxpayer identification are 2990 (Aldrich) and 0679 (Murray). The Debtors’ address is 800-E. Beaty Street, Davidson, North Carolina 28036.



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2. As stated in the Declaration of Valerie E. Ross, which is attached hereto as Exhibit A and incorporated herein by reference, Ms. Ross is a member in good standing of the Bar of the District of Columbia and the New York Bar and is admitted to practice before the United States Court of Appeals for the Fifth Circuit and the United States Court of Appeals for the District of Columbia Circuit. Further, Ms. Ross is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules pertinent to this matter.

3. With reference to all matters incident to this case, Ms. Ross submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of this chapter 11 case.

4. The \$300.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Valerie E. Ross to appear before the Court *pro hac vice* in this case.

Dated: April 3, 2024  
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada

Garland S. Cassada (NC Bar No. 12352)  
Richard C. Worf, Jr. (NC Bar No. 37143)  
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ATTORNEYS FOR DBMP LLC

**Exhibit A**

Declaration of Valerie E. Ross

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

In re

ALDRICH PUMP LLC and MURRAY  
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Chapter 11

Case No. 20-30608

**DECLARATION OF VALERIE E. ROSS  
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Valerie E. Ross, in support of the *Motion for Admission Pro Hac Vice for Valerie E. Ross* (the "Motion"),<sup>2</sup> declares as follows:

1. My name is Valerie E. Ross and I am a partner of the law firm of ArentFox Schiff with my office located at 1717 K Street NW, Washington, DC 20006. My telephone number is (202) 778-6453, and my facsimile number is (202) 857-6395. My e-mail address is valerie.ross@afslaw.com.

2. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.

3. I am a member in good standing of the Bar of the District of Columbia and the New York Bar and am admitted to practice before the United States Court of Appeals for the

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<sup>1</sup> The last four digits of the Debtors' taxpayer identification are 2990 (Aldrich) and 0679 (Murray). The Debtors' address is 800-E. Beaty Street, Davidson, North Carolina 28036.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

Fifth Circuit and the United States Court of Appeals for the District of Columbia Circuit. I have never been disbarred or suspended in any court where I am admitted to practice.

4. I have not been the subject of disciplinary action by the bar or courts of any state.

5. I am familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules pertinent to this matter.

6. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of this chapter 11 case.

7. I propose to practice in this Court for the purposes of representing DBMP LLC, a party in interest to the above-captioned case, as co-counsel with the law firm of Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 who are admitted to practice in this Court.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: April 3, 2024

/s/ Valerie E. Ross  
Valerie E. Ross

**Exhibit B**

Proposed Order

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

In re

ALDRICH PUMP LLC and MURRAY  
BOILER LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-30608

**ORDER ALLOWING VALERIE E. ROSS TO  
APPEAR AS COUNSEL FOR DBMP, PRO HAC VICE**

This matter having come before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the *Motion for Admission Pro Hac Vice for Valerie E. Ross* (the “Motion”) filed by Garland S. Cassada for the admission *pro hac vice* of Valerie E. Ross, to practice in this Court for the purposes of representing DBMP as co-counsel with counsel from the law firm of Robinson, Bradshaw & Hinson, P.A. who are admitted to practice in this Court; and it appearing to the Court, and the Court so finding, that for good cause shown the Motion should be granted;

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<sup>1</sup> The last four digits of the Debtors’ taxpayer identification are 2990 (Aldrich) and 0679 (Murray). The Debtors’ address is 800-E. Beaty Street, Davidson, North Carolina 28036.



NOW, THEREFORE, IT IS HERBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Valerie E. Ross shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned chapter 11 case.

This Order has been signed electronically.  
The Judge's signature and Court's seal appear at the top of the Order.

United States Bankruptcy Court

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