

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

MOTION FOR ADMISSION *PRO HAC VICE* FOR JEFFREY B. ELLMAN

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 Jeffrey B. Ellman to practice in this Court for the purpose of appearing in the above-captioned case, including on behalf of DBMP LLC. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Mr. Ellman is a partner of the law firm of Jones Day, with his office located at 1221 Peachtree Street, N.E., Suite 400 Atlanta, Georgia 30361. Mr. Ellman’s telephone number is (404) 521-3939, and his facsimile number is (404) 581-8330. Mr. Ellman’s e-mail address is jbellman@jonesday.com.

2. As stated in the Declaration of Jeffrey B. Ellman, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Ellman is a member in good standing of

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors’ address is 800-E Beaty Street, Davidson, North Carolina 28036.



the Bars of the States of Georgia and Ohio. He is admitted to practice in: (a) the United States District Courts for the Southern District of Ohio, the Northern District of Georgia, the Eastern District of Michigan, and the Southern District of Texas; and (b) the United States Court of Appeals for the Second Circuit. Further, as set forth in his Declaration, Mr. Ellman is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules.

3. With reference to all matters incident to this case, Mr. Ellman 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 Jeffrey B. Ellman to appear before the Court *pro hac vice* in this case.

Dated: April 3, 2024
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada

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ATTORNEYS FOR DBMP LLC

Exhibit A

Declaration of Jeffrey B. Ellman

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

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

**DECLARATION OF JEFFREY B. ELLMAN
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Jeffrey B. Ellman, in support of the *Motion for Admission Pro Hac Vice for Jeffrey B.*

Ellman (the "Motion"),² declares as follows:

1. My name is Jeffrey B. Ellman and I am a partner of the law firm of Jones Day, with my office located at 1221 Peachtree Street, N.E., Suite 400 Atlanta, Georgia 30361. My telephone number is (404) 521-3939, and my facsimile number is (404) 581-8330. My e-mail address is jbellman@jonesday.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 Bars of the States of Ohio and Georgia. I am admitted to practice before the United States District Courts for the Southern District of Ohio, the Northern District of Georgia, the Eastern District of Michigan, and the Southern District of Texas, and before the United States Court of Appeals for the Second Circuit.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

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 in this case, including 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/ Jeffrey B. Ellman
Jeffrey B. Ellman

Exhibit B

Proposed Order

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

In re

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**ORDER ALLOWING JEFFREY B. ELLMAN TO
APPEAR AS COUNSEL FOR DBMP LLC, 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 Jeffrey B. Ellman* (the "Motion") filed by Garland S. Cassada for the admission *pro hac vice* of Jeffrey B. Ellman, to practice in this Court in this case, including for the purposes of representing DBMP LLC 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;

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). 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, Jeffrey B. Ellman 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