

MCDERMOTT WILL & EMERY LLP

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Counsel to DIP Agent

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

)	
In re:)	Chapter 11
)	
ENVIVA INC., <i>et al.</i> , ¹)	Case No. 24-10453 (BFK)
)	Jointly Administered
Debtors.)	
)	

**MOTION FOR ENTRY OF AN ORDER AUTHORIZING CRISTIAN P. CATANESE
FROM MCDERMOTT WILL & EMERY LLP TO APPEAR AND
PRACTICE PRO HAC VICE ON BEHALF OF THE DIP AGENT**

Jennifer Routh, a partner in the law firm of McDermott Will & Emery LLP (the “Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, and admitted to practice in the United States District Court for the Eastern District of Virginia (the “Court”), hereby moves for the entry of an order (the “Order”), substantially in the form attached hereto as **Exhibit A**, authorizing Cristian P. Catanese, an associate in the law firm of McDermott Will & Emery LLP, One Vanderbilt Ave, New York, New York 10017 (the “Admittee”) to appear and practice *pro hac vice* as counsel to Acquiom Agency Services LLC (“Acquiom”) and Seaport Loan Products

¹ Due to the large number of Debtors in these jointly administered chapter 11 cases, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors’ claims and noticing agent at www.veritaglobal.net/enviva. The location of the Debtors’ corporate headquarters is: 7272 Wisconsin Avenue, Suite 1800, Bethesda, MD 20814.



LLC (“Seaport”), as co-administrative agents, and Acquiom as collateral agent (the “Collateral Agent,” and together with the co-administrative agents the “DIP Agent”), in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) and any related proceedings pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Bankruptcy Rules”). In support of this motion, the Movant states as follows:

Jurisdiction and Venue

The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

By this motion, the Movant seeks an order authorizing the Admittee to appear and practice *pro hac vice* on behalf of the DIP Agent.

Cristian P. Catanese is a member in good standing of the Bar of the State of New York. There are no disciplinary proceedings pending against him.

Pursuant to Local Bankruptcy Rules 2090-1(E)(3), 1075-1 and Exhibit 15 to the Local Bankruptcy Rules, an attorney from another state or the District of Columbia may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearances said attorney shall be accompanied by a member of this Bar.

The Admittee’s application is attached hereto as **Exhibit B** and incorporated by reference into this Motion (the “Application”).

Notice

No response period or notice of motion is required for this motion pursuant to Local Bankruptcy Rule 2090-1(E)(3).

WHEREFORE, for the reasons set forth herein, the Movant respectfully requests that the Court enter the Order, substantially in the form attached hereto as **Exhibit A**, (a) authorizing the Admittee to appear and practice *pro hac vice* on behalf of the DIP Agent, and (b) granting such other and further relief as is just and proper.

Dated: September 11, 2024
Alexandria, Virginia

MCDERMOTT WILL & EMERY LLP

/s/ Jennifer B. Routh
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Counsel to DIP Agent

EXHIBIT A

Proposed Order

MCDERMOTT WILL & EMERY LLP

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**IN THE UNITED STATES BANKRUPTCY COURT
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In re:)	Chapter 11
)	
ENVIVA INC., <i>et al.</i> , ¹)	Case No. 24-10453 (BFK)
)	Jointly Administered
Debtors.)	
)	Re: Docket No. ____

**ORDER AUTHORIZING CRISTIAN P. CATANESE FROM
MCDERMOTT WILL & EMERY LLP TO APPEAR AND
PRACTICE *PRO HAC VICE* ON BEHALF OF THE DIP AGENT**

Upon the motion (the “Motion”)² of Jennifer Routh (the “Movant”), a partner in the law firm of McDermott Will & Emery LLP, for the admission *pro hac vice* of Cristian P. Catanese, associate in the law firm of McDermott Will & Emery LLP, One Vanderbilt Ave, New York, NY 10017 (the “Admittee”) pursuant to Local Bankruptcy Rule 2090-1(E)(3), all as more fully set forth in the Motion; the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the relief requested

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² Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Motion.

therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

1. The Motion is granted. Cristian P. Catanese is authorized to appear and practice *pro hac vice* as counsel to Acquiom Agency Services LLC (“Acquiom”) and Seaport Loan Products LLC (“Seaport”), as co-administrative agents, and Acquiom as collateral agent (the “Collateral Agent,” and together with the co-administrative agents, the “DIP Agent”), in the above-captioned chapter 11 cases (the “Chapter 11 Cases”) and any related proceedings. The Application attached to the Motion as **Exhibit B** is hereby approved.

2. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

3. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: September __, 2024
Alexandria, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Jennifer B. Routh

Jennifer B. Routh (VA 95486)

MCDERMOTT WILL & EMERY LLP

500 North Capital Street, NW

Washington, DC 20001-1531

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Facsimile: (202) 756-8087

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Counsel to DIP Agent

**CERTIFICATION OF ENDORSEMENT
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)**

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Jennifer B. Routh

Jennifer B. Routh (VA 95486)

EXHIBIT B

Application

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(3)

In Case No.: 24-10453, * Case Name Enviva, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Cristian Peter Catanese
Bar Identification Number 6023840 State New York
Firm Name McDermott Will & Emery LLP
Firm Phone # (212) 547-5400 Direct Dial # (212) 547-5790 FAX # (212) 547-5444
E-Mail Address ccatanese@mwe.com
Office **Mailing** Address One Vanderbilt Avenue, New York, New York 10017
Name(s) of federal court(s) in which I have been admitted _____

I am a member in good standing of the Bar of the following United States District Court(s): _____

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

/s/ Cristian P. Catanese
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Jennifer B. Routh
(Signature)

September 11, 2024
(Date)

Jennifer B. Routh
(Typed or Printed Name)

**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.