

WRIGHT, CONSTABLE & SKEEN, LLP

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**U.S. BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

IN RE: ENVIVA INC., et al.

Debtors.

**CASE NO: 24-10453-BFK
Chapter 11
(Jointly Administered)**

**MOTION FOR ADMISSION *PRO HAC VICE*
(Michael A. Stover)**

Pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, Richard T. Pledger (“Movant”) respectfully moves for the admission of Michael A. Stover (“Proposed Admittee”) to appear *pro hac vice* in the above-captioned cases as counsel on behalf of Liberty Mutual Insurance Company (the “Motion”). In support of the Motion, as shown in the attached application of the Proposed Admittee, the Movant respectfully states as follows:

1. Proposed Admittee is admitted to practice in the United States District Court for the District of Maryland.
2. Proposed Admittee has never been disbarred, suspended, or denied admission to practice.



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3. Proposed Admittee understands that if he is admitted *pro hac vice* to practice before this Court, he will be subject to the disciplinary jurisdiction of this Court.

4. A copy of Proposed Admittee's written application as required by Local Bankruptcy Rule 2090-1(E)(3) is attached hereto as Exhibit A and incorporated herein by reference.

5. Co-counsel for the Proposed Admittee in these proceedings will be the undersigned, who has been formally admitted to the bar of this Court. As co-counsel, the undersigned will comply with all requirements of Rule 2090 of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.

6. Notice of this Motion is being provided to all parties via CM/ECF. Due to the administrative nature of the Motion, Movant submits that no further notice is required.

WHEREFORE, Movant respectfully requests that the Court approve the admission of Michael A. Stover in the above-captioned case as counsel for Liberty Mutual Insurance Company.

Dated: January 13, 2025

Respectfully submitted,

LIBERTY MUTUAL INSURANCE COMPANY

By Counsel

/s/ Richard T. Pledger
Richard T. Pledger (VSB No. 28102)
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and

Michael A. Stover (admission *pro hac vice* pending)

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of January, 2025, the foregoing was filed using the Court's CM/ECF system, which will send a Notice of Electronic Filing to all counsel who have entered an appearance in this matter.

/s/ Richard T. Pledger

Richard T. Pledger

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 BFK, * Case Name Enviva, Inc.

PERSONAL STATEMENT

FULL NAME (no initials, please) Michael Alden Stover
Bar Identification Number 10497/9106200273 State Maryland
Firm Name Wright, Constable & Skeen, LLP
Firm Phone # 410-659-1300 Direct Dial # 410-659-1321 FAX # 410-659-1350
E-Mail Address mstover@wcslaw.com
Office Mailing Address One Olympic Place, 8th Fl., Towson, Maryland 21204
Name(s) of federal court(s) in which I have been admitted Third Circuit, Fourth Circuit, District of D.C., EDVA

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

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.


(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*.


(Signature)

Richard T. Pledger

(Typed or Printed Name)

13 January 2025
(Date)

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