

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

F21 OPCO, LLC, *et al.*,

Debtors.

Chapter 11

Case No. 25-10469 (MFW)

(Jointly Administered)

MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Rule 9010-1 and the attached certification, counsel moves the admission *pro hac vice* of Andres Barajas of Kelley Drye & Warren LLP to represent Steven Balasiano of MHR Advisory Group, LLC, not individually, but solely in his capacity as the Plan Administrator in this action.

Dated: July 16, 2025

/s/ Justin R. Alberto

Justin R. Alberto (No. 5126)

COLE SCHOTZ P.C.

500 Delaware Avenue, Suite 600

Wilmington, Delaware 19801

Telephone: (302) 652-3131

Email: jalberto@coleschotz.com

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing, and in good standing as a member of the Bar of the State of New York, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with Standing Order for District Court Fund revised 12/21/23. I further certify that the fee of \$50.00 has been paid to the Clerk of Court for District Court.

Dated: July 16, 2025

/s/ Andres Barajas

Andres Barajas

KELLEY DRYE & WARREN LLP

3 World Trade Center

175 Greenwich Street

New York, New York 10007

Telephone: (212) 808-7800

Email: abarajas@kelleydrye.com

ORDER GRANTING MOTION

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.

