

WOLLMUTH MAHER & DEUTSCH LLP

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*Co-Counsel for Munmorah Battery ProjectCo
Pty Ltd and Ulinda Park ProjectCo Pty Ltd*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

POWIN, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: 25-16137 (MBK)

(Jointly Administered)

Judge: Hon. Michael B. Kaplan

APPLICATION TO ADMIT JOSEPH F. PACELLI *PRO HAC VICE*

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that pursuant to Rule 2090-1 of the District of New Jersey Local Bankruptcy Rules, Wollmuth Maher & Deutsch LLP, co-counsel for Creditors, Munmorah Battery ProjectCo Pty Ltd and Ulinda Park ProjectCo Pty Ltd (together, the "Creditors"), hereby makes the application before the United States Bankruptcy Court for the District of New Jersey,

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin Project LLC [1583]; (ii) Powin, LLC [0504]; (iii) PEOS Holdings, LLC [5476]; (iv) Powin China Holdings 1, LLC [1422]; (v) Powin China Holdings 2, LLC [9713]; (vi) Charger Holdings, LLC [5241]; (vii) Powin Energy Ontario Storage, LLC [8348]; (viii) Powin Energy Operating Holdings, LLC [2495]; and (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.



for the entry of an Order admitting Joseph F. Pacelli of the law firm Wollmuth Maher & Deutsch LLP *pro hac vice* in the within proceeding to represent the Creditors.

The undersigned relies upon the Certifications of Paul R. DeFilippo and Joseph F. Pacelli in support of this application.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no objection to the within application is filed within seven (7) days, the application be granted and the proposed form of Order be entered.

Dated: June 11, 2025
New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

/s/ Paul R. DeFilippo
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-and-
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Chapter 11

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**CERTIFICATION OF PAUL R. DeFILIPPO IN SUPPORT OF APPLICATION
FOR ADMISSION OF ATTORNEY *PRO HAC VICE* OF JOSEPH F. PACELLI**

I, Paul R. DeFilippo, of full age, hereby certify as follows:

1. I am a partner with the law firm of Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110. I am admitted to practice law in the State of New Jersey and the United States District Court for the District of New Jersey.

2. I make this Certification in support of the application of Joseph F. Pacelli to practice before this court *pro hac vice* pursuant to D.N.J. LBR 2090-1. The facts contained in

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the Certification of Joseph F. Pacelli are true and correct to the best of my knowledge, information, and belief.

3. I am co-counsel of record in this matter and will work closely with Joseph F. Pacelli. As co-counsel of record, I will sign all pleadings, briefs, and other papers filed with the Court and understand that I will be held responsible for Joseph F. Pacelli and the conduct of this case.

I certify that the foregoing statements are true to the best of my knowledge, information, and belief under penalty of perjury.

Dated: June 11, 2025

/s/ Paul R. DeFilippo
Paul R. DeFilippo

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

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Debtors.

Chapter 11

Case No.: 25-16137 (MBK)

(Jointly Administered)

Judge: Hon. Michael B. Kaplan

**CERTIFICATION OF JOSEPH F. PACELLI IN SUPPORT OF
APPLICATION FOR ADMISSION OF ATTORNEY *PRO HAC VICE***

I, Joseph F. Pacelli, of full age, hereby certify as follows:

1. I am an associate with the law firm of Wollmuth Maher & Deutsch LLP, 500 Fifth Avenue, New York, New York 10110.
2. I make this certification in connection with my application to be admitted *pro hac vice* in the above captioned bankruptcy case to represent Creditors, Munmorah Battery ProjectCo

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Pty Ltd and Ulinda Park ProjectCo Pty Ltd as co-counsel.

3. I am a member in good standing of the bars of the following courts, to which I was admitted in the years indicated: State of New York (2020), and U.S. District Court for the Southern District of New York (2020).

4. I am not under suspension or disbarment by any court.

5. I have no disciplinary proceeding pending against me in any jurisdiction, and no discipline has previously been imposed on me in any jurisdiction.

6. I have been advised of my obligation to make payments of an annual fee to the New Jersey Lawyers Fund For Client Protection in accordance with New Jersey Court Rule 1:28-2, and have already satisfied that payment for 2025 in connection with my admission *pro hac vice* before this Court in an unrelated bankruptcy matter, *In re Wayne Burt Pte. Ltd. (In Liquidation)*, Case No. 24-19956 (MBK).

7. I have familiarized myself with the Local Rules of Bankruptcy Procedure promulgated by this Court and will at all times conduct myself in accordance with such Rules during the conduct of this case.

8. I understand that if I am admitted *pro hac vice* to this Court, I am within its disciplinary jurisdiction and I voluntarily consent to the same and certify that I will abide with all rules, regulations and orders of this Court.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: June 11, 2025

/s/ Joseph F. Pacelli
Joseph F. Pacelli

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)
WOLLMUTH MAHER & DEUTSCH LLP**

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*ATTORNEYS FOR MUNMORAH BATTERY PROJECT CO
PTY LTD AND ULINDA PARK PROJECT CO PTY LTD*

In re:

POWIN, LLC, *et al.*,¹

Debtors.

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ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

¹

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This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L. Civ. R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Joseph F. Pacelli, Esq. be permitted to appear pro hac vice; provided that pursuant to D.N.J. L. Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.