

BRESSLER, AMERY & ROSS, P.C.
325 Columbia Turnpike
Florham Park, New Jersey 07932
P.O. Box 1980
Morristown, New Jersey 07962
(973) 514-1200 (phone)
(973) 514-1660 (facsimile)
Attorneys for Creditor
Expeditors International
Of Washington, Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:

POWIN, LLC,

Debtor.

Case No. 25-16137 (MBK)

Hon. Michael B. Kaplan.

**NOTICE OF MOTION TO
ADMIT LISA M. KRESGE
*PRO HAC VICE***

Returnable: September , 2025

TO: ALL COUNSEL

COUNSEL:

PLEASE TAKE NOTICE that on September __, 2025, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Creditor, Expeditors International of Washington, Inc. ("Creditor"), in the above-captioned matter shall move before the Court for an Order pursuant to Local Rule 101.1(c) admitting Lisa M. Kresge *pro hac vice* in the above-captioned matter.



PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Creditor will rely upon the enclosed the Certifications of David H. Pikus and Lisa M. Kresge.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Respectfully Submitted,

BRESSLER, AMERY & ROSS, P.C.
Attorneys for Creditor
Expeditors International of Washington, Inc.

By: 
David H. Pikus

Dated: September 2, 2025

BRESSLER, AMERY & ROSS, P.C.
325 Columbia Turnpike
Florham Park, New Jersey 07932
P.O. Box 1980
Morristown, New Jersey 07962
(973) 514-1200 (phone)
(973) 514-1660 (facsimile)
Attorneys for Creditor
Expeditors International
Of Washington, Inc.

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

In re:

POWIN, LLC

Debtor.

Case No. 25-16137 (MBK)

Chapter 11

**CERTIFICATION OF
DAVID H. PIKUS IN SUPPORT OF
MOTION TO ADMIT
LISA M. KRESGE *PRO HAC VICE***

I, David H. Pikus, being of full age, hereby certify as follows:

1. I am an attorney-at-law of the State of New Jersey, and I am admitted to practice in the United States District Court for the District of New Jersey.
2. I am a principal attorney at the law firm of Bressler, Amery & Ross, P.C., attorneys for Creditor Expeditors International of Washington, Inc. ("Creditor") in the above-captioned matter. As such, I have personal knowledge of the facts set forth herein.
3. I respectfully submit this Certification in support of the motion to admit Lisa M. Kresge *pro hac vice* in the above-captioned matter pursuant to Local Civil Rule 101.1(c).
4. For purposes of Ms. Kresge's requested admission, I will serve as local counsel upon which all notices, orders and pleadings may be served. Further, I agree to comply with

the provisions of Local Civil Rule 101.1(c) with respect to the admission of Ms. Kresge *pro hac vice* and in my capacity as local counsel of record for Creditor.

5. I respectfully request that for the reasons stated in the Certification of Lisa M. Kresge submitted herewith that the Court grant the admission of Ms. Kresge *pro hac vice* for purposes of representing Creditor in the above-captioned matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.



David H. Pikus, Esq.

DATED: September 2, 2025

David H. Pikus
BRESSLER, AMERY & ROSS
A Professional Corporation
P.O. Box 1980
Morristown, NJ 07962
325 Columbia Turnpike
Florham Park, NJ 07932
(973) 514-1200
dpikus@bressler.com
Attorneys for Creditor Expeditors International of Washington, Inc.

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

In re:	:	
	:	Case No. 25-16137 (MBK)
POWIN LLC,	:	
	:	Chapter 11
Debtor.	:	

DECLARATION IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

LISA M. KRESGE declares under penalty of perjury pursuant to 28 U.S.C. §1746
as follows:

1. I submit this Declaration in support of my motion for admission *pro hac vice* in this matter on behalf of Expeditors International of Washington, Inc., a secured creditor of the Debtor. I am a partner with the law firm of Brennan, Scungio & Kresge LLP, 362 Broadway, Providence, RI 02909. I may be reached by e-mail at lkresge@bsklp.com, by telephone at (401) 453-4300 and by facsimile at (401) 453-2345. Pursuant to the Court Rules, notices, orders and pleadings may be served on David H. Pikus, Esq., Bressler, Amery & Ross, P.C., 325 Columbia Turnpike, Florham Park, NJ 07932, telephone (973) 514-1200, facsimile (973) 514-1660 and e-mail dpikus@bressler.com, a member of the Bar of this Court.

2. I am a member in good standing of the bar of the Commonwealth of Massachusetts, having been admitted to this bar in 1999. The roll of attorneys admitted to practice law in the Commonwealth of Massachusetts is maintained by the Board of Bar Overseers, 1 Beacon Street, 10th Floor, Massachusetts 02108.

3. I am a member in good standing of the bar of the State of Rhode Island, having been admitted to this bar in 2012. The roll of attorneys admitted to practice law in the State of Rhode Island is maintained by the Rhode Island Supreme Court, Providence County Courthouse, 250 Benefit Street, Providence, RI 02903.

3. I am also admitted to practice and am in good standing in the United States District Courts for the Districts of Rhode Island and Massachusetts.

4. I am a member in good standing of each and every bar to which I am admitted. I have never been under suspension or disbarred by any court, state or federal. I am not ineligible for admission to the bar of the United States District Court for the District of New Jersey. No disciplinary proceeding is pending against me in any jurisdiction and no discipline has ever been imposed against me in any jurisdiction.

5. I am familiar with bankruptcy proceedings in general. I have practiced almost exclusively in this field since my admission to the bar.

6. I am familiar with the District of New Jersey Local Bankruptcy Rules and the Local Civil Rules of the United States District Court for the District of New Jersey.

7. I am aware of my obligations pursuant to the Local Civil Rules of the United States District Court for the District of New Jersey as made applicable to this Court by the District of New Jersey Local Bankruptcy Rules. If granted *pro hac vice* admission to this Court I will, to the best of my ability, faithfully comply with all the local rules and customs

of this Court, including the payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

8. I respectfully request that I be granted *pro hac vice* admission in these bankruptcy proceedings because my firm and I have served as the client's legal counsel in this, and numerous other matters. The client has asked for my representation in this matter. I am fully familiar with the facts of the instant matter. I believe that my participation in these bankruptcy proceedings will benefit the client and assist in the prompt and efficient resolution of these proceedings as a whole.

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



LISA M. KRESGE

Dated: September 2, 2025

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

In Re:

Case No.: _____

Adv. No.: _____

Chapter: _____

Judge: _____

ORDER FOR ADMISSION PRO HAC VICE

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

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 _____ 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, N.J. 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.

rev.03/01/2024