## UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

)

)

In re			

PREMIER KINGS, INC.

Case No.: 23-bk-02871-TOM-11

Debtor. ) Chapter 11

)

## MOTION TO APPEAR PRO HAC VICE <u>FILED BY KATHERYN E. HANCOCK</u>

Katheryn E. Hancock ("Applicant") moves this Court to permit her to be admitted to practice before this Court in the above-captioned matter *pro hac vice* on behalf of creditor Tracey Scussell ("Creditor"), and represents as follows:

1. Applicant is an attorney practicing law at Thames | Markey, with an office located at:

50 North Laura Street, Suite 1600 Jacksonville, Florida 32202 (904) 358-4000

(904) 358-4000 (904) 358-4001 (Facsimile) keh@thamesmarkey.com

2. Applicant has been retained by creditor Tracey Scussell, who has a civil lawsuit against Debtor, as more fully described in the complaint in the case styled *Tracey Scussell v. Premier Kings of Georgia Inc.*, Circuit Court, Fourth Judicial Circuit, Nassau County, Florida; Case No.: 22-CA-239 (the "State Court Litigation").



Case 23-02871-TOM11 Doc 816 Filed 08/30/24 Entere Main Document Page 1 of 2 3. Since October 7, 2010, Applicant has been, and presently is, a member in good standing with The Florida Bar. Florida is the jurisdiction where Applicant resides and regularly practices law. A Certificate of Good Standing is attached hereto.

4. Applicant has been admitted to practice before the following courts:

- i. All courts in the state of Florida
- ii. United States District Court for the Middle District of Florida
- iii. United States District Court for the Southern District of Florida
- iv. All courts in the state of Tennessee (currently on inactive status)
- v. United States District Court for the Eastern District of Tennessee

WHEREFORE, Applicant requests that the Court grants this application and enters an Order permitting her to appear as counsel *pro hac vice* and participate as counsel for the Creditor in this matter.

August 30, 2024

## **THAMES | MARKEY**

/s/ Katheryn E. Hancock

By \_\_\_\_

Katheryn E. Hancock

Florida Bar Number 0085945 50 North Laura Street, Suite 1600 Jacksonville, Florida 32202 (904) 358-4000 (904) 358-4001 (Facsimile) keh@thamesmarkey.law

Attorneys for Tracey Scussell

[835605/1]