Docket #0238 Date Filed: 7/31/2014

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

IN RE: TELEXFREE, LLC Debtor	**Chapter 11** **Case No. 14-40987 MSH**
ANTHONY CELLUCCI, JAMILLY LAKE AND GERIVALDO PACHECO - PUTATIVE CLAIMS REPRESENTATIVES AND THOSE SIMILARLY SITUATED, **Plaintiffs,** **v.** **TELEXFREE, INC., et al.,** **Defendants.**	**ADVERSARY PROCEEDING NO. 14-04057 MSH**

MOTION FOR LEAVE FOR
ADAM K. DOERR TO APPEAR PRO HAC VICE

Pursuant to Rule 9010-1(b) of the Local Rules of United States Bankruptcy Court for the District of Massachusetts ("Local Rules"), the Defendants Wells Fargo & Company and Wells Fargo Bank, N.A. (collectively ("Wells Fargo"), by their attorney Paul S. Samson, moves this court to admit Adam K. Doerr of Robinson, Bradshaw & Hinson, PA, 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246, to appear, defend and practice *pro hac vice* as co-counsel on behalf of the Wells Fargo Defendants. Mr. Doerr is a member in good standing of the State Bar of North Carolina. He is also admitted to practice in the following courts: Supreme Court of North Carolina, United States Supreme Court, United States Court of Appeals for the Fourth Circuit, United States District Court for the Western District of North Carolina, United

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States District Court for the Middle District of North Carolina, and the United States District Court for the Eastern District of North Carolina. There are no disciplinary proceedings pending against Mr. Doerr in any jurisdiction. Mr. Doerr is familiar with the Local Rules of this Court. Mr. Samson, a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, will continue to represent Wells Fargo if this motion is granted.

WHEREFORE, Wells Fargo respectfully requests that this Court admit Adam K. Doerr to appear, defend, and practice in this case as co-counsel on behalf of Wells Fargo. In support of this motion, Wells Fargo also submits the Declaration of Adam K. Doerr, attached hereto as Exhibit A.

Respectfully submitted this 31st day of July, 2014.

/s/ Paul S. Samson
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UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

In Re: TELEXFREE, LLC, Debtor	Chapter 11 Case No. 14-40987(MSH)
ANTHONY CELLUCCI, JAMILLY LAKE AND GERIVALDO PACHECO - Putative Claims Representatives' And Those Similarly Situated, Plaintiffs, vs. TELEXFREE, LLC, Et. al., Defendants.	Adversary Proceeding No. 14-04057 (MSH)

CERTIFICATE OF SERVICE

I, Paul S. Samson, Esquire, hereby certify that a true and correct copy of the **MOTION FOR LEAVE FOR ADAM K. DOERR TO APPEAR PRO HAC VICE** filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and that paper copies will be sent by first-class mail to all parties, as indicated, on July 31, 2014.

/s/ Paul S. Samson

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TELEXFREE, LLC
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Adversary Proceeding No. 14-04057

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EXHIBIT A

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

IN RE: TELEXFREE, LLC Debtor	**Chapter 11** **Case No. 14-40987 MSH**
ANTHONY CELLUCCI, JAMILLY LAKE AND GERIVALDO PACHECO - PUTATIVE CLAIMS REPRESENTATIVES AND THOSE SIMILARLY SITUATED, **Plaintiffs,** **v.** **TELEXFREE, INC., et al.,** **Defendants.**	**ADVERSARY PROCEEDING NO. 14-04057 MSH** **Judge Melvin S. Hoffman**

DECLARATION OF ADAM K. DOERR IN SUPPORT
OF MOTION FOR LEAVE TO APPEAR PRO HAC VICE

I, Adam K. Doerr, declare as follows:

1. I am an attorney with the law firm of Robinson, Bradshaw & Hinson, PA in its Charlotte, North Carolina office. I make this declaration in support of the accompanying motion for leave to appear *pro hac vice*. I have personal knowledge of each of the facts stated below.

2. My business address is 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246. My business telephone number is 704-377-8114. My business fax is 704-339-3441. My e-mail address is adoerr@rbh.com.

3. I am a member of the bar in good standing of the North Carolina State Bar and of the bar of every court in which I have been admitted to practice, namely: Supreme Court of the

United States, Supreme Court of North Carolina, United States District Court for the Western District of North Carolina, United States District Court for the Middle District of North Carolina, United States District Court for the Eastern District of North Carolina, and the United States Court of Appeals for the Fourth Circuit. (This list does not include pro hac vice admissions in numerous other courts.)

4. I have never been suspended or disbarred in any jurisdiction, nor have I been the subject of any professional disciplinary action, nor do I have complaints or other proceedings pending against me before any disciplinary board, commission, court or bar association.

5. I have reviewed and am familiar with the Local Rules of the United States Bankruptcy Court for the District of Massachusetts.

6. This is the first time in the past 12 months that I have sought admission to practice *pro hac vice* in this court.

This 28th day of July, 2014.



Adam K. Doerr