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*Proposed Attorneys for the Disinterested Directors of
Thrasio Holdings, Inc.*

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

In re:

THRASIO HOLDINGS, INC., et al.,

Debtors.¹

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

APPLICATION FOR PRO HAC VICE ADMISSION OF MARC B. ROITMAN

Anthony R. Horton and Stefan M. Selig, in their capacity as disinterested directors of Thrasio Holdings, Inc. (the “Disinterested Directors”), by and through their proposed counsel, Katten Muchin Rosenman LLP, respectfully submit this application (the “Application”), for the *pro hac vice* admission of Marc B. Roitman, Esq. and represent as follows:

1. On February 28, 2024, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code, commencing the above captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey.

2. Marc B. Roitman, Esq. is a member of the firm of Katten Muchin Rosenman LLP and has represented the Disinterested Directors in connection with these matters. Because of his

¹ The last four digits of Debtor Thrasio Holdings, Inc.’s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors’ service address in these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.



familiarity with the facts and circumstances relevant to the Disinterested Directors in these matters, the Disinterested Directors request that Mr. Roitman be allowed to appear *pro hac vice* in the within matters.

3. As set forth in the Certification of Mr. Roitman, annexed hereto as **Exhibit A**, Mr. Roitman is a member in good standing of the bar of the State of New York. Mr. Roitman is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Mr. Roitman has represented that he will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant the Disinterested Directors' Application, pursuant to D.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel *pro hac vice* in the above captioned matters.

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP
Proposed Attorneys for the Disinterested
Directors

By: /s/ Grace A. Thompson
Grace A. Thompson

Date: May 9, 2024

KATTEN MUCHIN ROSENMAN LLP

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*Proposed Attorneys for the Disinterested Directors of
Thrasio Holdings, Inc.*

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

In re:

THRASIO HOLDINGS, INC., et al.,

Debtors.¹

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

**CERTIFICATION OF MARC B. ROITMAN IN SUPPORT OF APPLICATION FOR
PRO HAC VICE ADMISSION OF MARC B. ROITMAN**

Marc B. Roitman, of full age, hereby certifies as follows:

1. I am an attorney-at-law duly admitted to practice before the courts of the State of New York. I am a partner of the firm of Katten Muchin Rosenman LLP, proposed counsel for Anthony R. Horton and Stefan M. Selig, in their capacity as disinterested directors of Thrasio Holdings, Inc. (the "Disinterested Directors"). I submit this Certification in support of the accompanying Application for admission *pro hac vice*.

¹ The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors' service address in these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

2. I was admitted to practice to the State of New York in 2010, the United States District Court for the Southern District of New York in 2010, and the United States District Court for the Eastern District of New York in 2010.

3. I am in good standing before the courts in which I am admitted, and I have not been disbarred, suspended or disciplined by any court or administrative body. The name and address of the office maintaining the roll of members in good standing for the State of New York bar is Appellate Division, 2nd Department, 45 Monroe Place, Brooklyn, NY 11201. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Southern District of New York bar is Southern District of New York, 500 Pearl Street, New York, New York 10007. The name and address of the office maintaining the roll of members in good standing for the United States District Court for the Eastern District of New York bar is United States District Court for the New York Eastern District, 225 Cadman Plaza East, Brooklyn, New York 11201.

4. The Disinterested Directors filed the within Application for my *pro hac vice* admission in these matters due to my familiarity with the facts and circumstances relevant to their interests. If the Application is granted, I agree to abide by this Court's local rules and to submit myself to the disciplinary jurisdiction of this Court.

5. I hereby designate the following member of the bar of this Court with whom the Court and opposing counsel may communicate with regarding these cases: Grace A. Thompson, Esq.

6. For the foregoing reasons, I respectfully request my application for admission *pro hac vice* be granted.

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

/s/ Marc B. Roitman

Marc B. Roitman, Esq.

KATTEN MUCHIN ROSENMAN LLP

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DATED: May 9, 2024

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)
KATTEN MUCHIN ROSENMAN LLP
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*Proposed Attorneys for the Disinterested
Directors of Thrasio Holdings, Inc.*

In Re:

THRASIO HOLDINGS, INC., *et al.*

Debtors¹

Case No.: 24-11840

Adv. No.: _____

Chapter: 11

Judge: Christine M. Gravelle

ORDER FOR ADMISSION PRO HAC VICE

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

1. The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors' service address in these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

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 Marc B. Roitman, 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, 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.

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