

James S. Carr  
Maeghan J. McLoughlin (*pro hac vice* pending)  
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*Co-Counsel to the Official  
Committee of Unsecured Creditors*

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

<p>In re:</p> <p>THRASIO HOLDINGS, INC., <i>et al.</i>,</p> <p>Debtors.<sup>1</sup></p>	<p>Chapter 11</p> <p>Case No. 24-11840 (CMG)</p> <p>(Jointly Administered)</p>
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**APPLICATION FOR PRO HAC VICE ADMISSION OF  
RICHARD D. GAGE**

James S. Carr, a member in good standing of the bars of New Jersey and New York (the “Movant”), pursuant to L. Civ. Rule 101.1(c) and D.N.J. LBR 9010-1, respectfully moves this Court, on behalf of attorney Richard D. Gage, for an order granting permission for Mr. Gage to appear *pro hac vice* on behalf of the Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned chapter 11 cases and in any related adversary proceeding(s) filed or to be filed in these chapter 11 cases. In support of this request, the Movant represents as follows:

<sup>1</sup> 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 (continued...)



1. I am a partner of the law firm of Kelley Drye & Warren LLP, which maintains an office at One Jefferson Road, 2<sup>nd</sup> Floor, Parsippany, New Jersey 07054. I am admitted to practice in the state of New Jersey and before the United States District Court for the District of New Jersey, and I am familiar with the Local Rules of practice of this Court. There are no disciplinary proceedings which are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

2. As set forth in the certification of Richard D. Gage annexed hereto, Mr. Gage is special counsel in the bankruptcy department at the law firm of Kelley Drye & Warren LLP. Upon information and belief, Mr. Gage is a member in good standing of the bar of the State of New York. No disciplinary proceedings are pending against him nor has any discipline been imposed on him in any jurisdiction.

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

4. I have appeared as counsel of record for the Committee in these chapter 11 cases and shall serve as local counsel upon whom all notices, orders, and pleadings shall be served.

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(...continued)

on the website of the Debtors' claims and noticing agent at <https://www.kcellc.net/Thrasio>. The Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

**WHEREFORE**, Movant respectfully requests entry of the Order submitted herewith granting admission *pro hac vice* of Richard D. Gage to represent the Committee in connection with the above-captioned chapter 11 cases and any related adversary proceedings.

Dated: May 13, 2024

**KELLEY DRYE & WARREN LLP**

By: /s/ James S. Carr  
James S. Carr  
Maeghan J. McLoughlin (*pro hac vice* pending)  
Connie Y. Choe  
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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
THRASIO HOLDINGS, INC., <i>et al.</i> ,	Case No. 24-11840 (CMG)
Debtors. <sup>1</sup>	(Jointly Administered)

**CERTIFICATION OF RICHARD D. GAGE IN SUPPORT  
OF APPLICATION FOR ADMISSION PRO HAC VICE**

I, Richard D. Gage, pursuant to 28 U.S.C. § 1746, hereby certify:

1. I am an attorney with the law firm of Kelley Drye & Warren LLP, which maintains an office at 3 World Trade, 175 Greenwich Street, New York, New York 10007.
2. I am, and have always been, a member in good standing of the bar of the State of New York (2015), United States District Court for the Southern District of New York (2020), United States Court of Appeals in the Second Circuit (2021) and Fifth Circuit (2023). No

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<sup>1</sup> 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' claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

disciplinary proceedings are pending against me in any jurisdiction and no discipline has been imposed on me in any jurisdiction.

3. Upon being admitted to appear and participate in these cases *pro hac vice*, I shall promptly cause payment to be made to the Clerk of Court in the amount of \$250.00 pursuant to Rule 101.1(c)(3) of the Local Civil Rules of the United States District Court for the District of New Jersey.

4. James S. Carr, a partner of the law firm of Kelley Drye & Warren LLP, has appeared as counsel of record for the Official Committee of Unsecured Creditors in the above-captioned chapter 11 cases and shall be local counsel upon whom all notices, orders, and pleadings shall be served.

5. I am in possession of and have reviewed a copy of the Local Bankruptcy Rules of this Court.

6. I understand and agree that, if admitted *pro hac vice*, I will be bound by the rules of this Court, including all applicable disciplinary rules, and that I will notify this Court immediately of any matter affecting my good standing before the bar of any jurisdiction.

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

Dated: May 13, 2024

/s/ Richard D. Gage  
Richard D. Gage

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

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

James S. Carr  
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*Co-Counsel to the Official  
Committee of Unsecured Creditors*

In re:

THRASIO HOLDINGS, INC., *et al.*,  
  
Debtors.<sup>1</sup>

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

**ORDER FOR ADMISSION PRO HAC VICE**

The relief set forth on the following pages, numbered two (2) through and including three (3), is hereby **ORDERED**.

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<sup>1</sup> 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' claims and noticing agent at <https://www.kccllc.net/Thrasio>. The Debtors' service address for purposes of these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

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Debtors: THRASIO HOLDINGS, INC., *et al.*

Case No.: 24-11840 (CMG)

Caption of Order: ORDER FOR ADMISSION PRO HAC VICE

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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, an 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 Richard D. Gage 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. 101.1(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:

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Debtors: THRASIO HOLDINGS, INC., *et al.*

Case No.: 24-11840 (CMG)

Caption of Order: ORDER FOR ADMISSION PRO HAC VICE

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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 five (5) days of its date of entry.