UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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

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Counsel for Public Service Electric and Gas Company

In re: Chapter 11

ALUMINUM SHAPES, L.L.C., Case No. 21-16520 (JNP)

Debtor. Honorable Jerrold N. Poslusny Jr.

APPLICATION FOR ADMISSION OF RUSSELL R. JOHNSON III PRO HAC VICE

The undersigned hereby seeks an Order granting the admission *pro hac vice* of Russell R. Johnson III of the Law Firm of Russell R. Johnson III, PLC to practice before this Court in connection with the above-captioned matter. This application (the "Application") is submitted pursuant to Rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, Michael Kwiatkowski hereby represents as follows:

1. I am an attorney with Cullen and Dykman LLP, which law firm maintains offices at 100 Quentin Roosevelt Boulevard, Garden City, New York 11530. Cullen and Dykman LLP has been retained to serve as local counsel for Public Service Electric and Gas Company ("PSE&G") in connection with the above-captioned matter.

- 2. I am an attorney-at-law of the State of New Jersey, and I am admitted to practice before the U.S. District Court for the District of New Jersey.
- 3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an *Order Approving Admission, Pro Hac Vice, of Russell R. Johnson III*.
- 4. Mr. Johnson is an attorney with the Law Firm of Russell R. Johnson III, PLC which maintains an address of 2258 Wheatlands Drive, Manakin-Sabot, VA 23103.
- 5. Attached is a certification of Mr. Johnson in which he certifies that he has been admitted to the bar of the State of Virginia since 1990. He also certifies that he has been admitted to practice in the following courts: U.S. District Court Eastern District of Virginia (1990), U.S. Court of Appeals 4th Circuit (1990), U.S. Court of Appeals 6th Circuit (2008), U.S. Court of Appeals 8th Circuit (2012), U.S. District Court Western District of Virginia (1991), U.S. District Court Eastern District of Michigan (2008), U.S. District Court Western District of Pennsylvania (2015), U.S. Bankruptcy Court Eastern District of Virginia, (1990), and the U.S. Bankruptcy Court Western District of Virginia (1991)
- 6. Mr. Johnson further certifies that he is, and has remained, a member in good standing of said bar at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.
- 7. Mr. Johnson is familiar with the circumstances surrounding the above-captioned matter and applicable facts and law, and his presence will serve the best interests of PSE&G.

WHEREFORE, Applicant respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Russell R. Johnson III to represent PSE&G as primary counsel in connection with the above-captioned matter.

Dated: Garden City, New York August 17, 2021

Respectfully Submitted,

CULLEN AND DYKMAN LLP

By: /s/Michael Kwiatkowski
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-and-

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Counsel for Public Service Electric and Gas Company

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CERTIFICATION OF RUSSELL R. JOHNSON III IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE

Russell R. Johnson III certifies, pursuant to 28 U.S.C. § 1746, as follows:

- 1. I am an attorney with the Law Firm of Russell R. Johnson III, PLC, which maintains a business address of 2258 Wheatlands Drive, Manakin-Sabot, VA 23103.
- 2. I make this certification in support of my application (the "<u>Application</u>") pursuant to the rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "<u>Local Rules</u>"), for admission to the Bankruptcy Court *pro hac vice*. I request to be admitted *pro hac vice* to serve as co-counsel to Public Service Electric and Gas Company ("PSE&G") in connection with the above-captioned matter.
- 3. I am and have been a member in good standing of the bar of the State of Virginia since 1990. I am also admitted to practice before the U.S. District Court Eastern District of Virginia (1990), U.S. Court of Appeals 4th Circuit (1990), U.S. Court of Appeals 6th Circuit (2008), U.S. Court of Appeals 8th Circuit (2012), U.S. District Court Western District of Virginia

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(1991), U.S. District Court Eastern District of Michigan (2008), U.S. District Court Western

District of Pennsylvania (2015), U.S. Bankruptcy Court Eastern District of Virginia, (1990), and

the U.S. Bankruptcy Court Western District of Virginia (1991).

4. I am, and have remained, a member in good standing of said bars at all times. No

disciplinary proceedings are pending against me in any jurisdiction and no discipline has

previously been imposed on me in any jurisdiction.

5. I am familiar with the circumstances surrounding the above-captioned bankruptcy

case and applicable law.

6. I am not admitted to practice law in the State of New Jersey and therefore believe

it is necessary for me to seek pro hac vice admission in the above-captioned matter.

7. If admitted pro hac vice, I agree to abide by the Local Bankruptcy Rules, and to

make the payments to Clerk of the United States Court for the District of New Jersey and the New

Jersey Lawyer's Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the

United States District Court for the District of New Jersey.

8. I agree to (i) abide by the Court Rules for the United States District Court and

United States Bankruptcy Court for the District of New Jersey, (ii) immediately notify this Court

of any matter affecting my standing in any court to which I am admitted; and (iii) have all

pleadings, briefs, and other papers filed with this Court signed by an attorney of record

authorized to practice in the State of New Jersey.

I certify under penalty of perjury that the foregoing is true and correct to the best of my

knowledge and information.

Dated: August 17, 2021

s/ Russell R. Johnson III

Russell R. Johnson III

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

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ORDER FOR ADMISSION PRO HAC VICE OF RUSSELL R. JOHNSON III

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 Russell R. Johnson III 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 file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, 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 \$150.00 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.