

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF KENTUCKY  
LEXINGTON DIVISION**

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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>Cambrian Holding Company, Inc., et al.,</b>	)	<b>Case No. 19-51200-grs</b>
	)	
<b>Debtors.<sup>1</sup></b>	)	<b>(Jointly Administered)</b>
	)	
	)	<b>Hon. Gregory A. Schaaf</b>
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**MOTION FOR ADMISSION *PRO HAC VICE* OF RUSSELL R. JOHNSON, III**

Pursuant to Rule 83.2 of the Joint Local Rules of Civil Practice for the Eastern and Western Districts of Kentucky, the undersigned, a member of the Bar of this Court, files this motion (the “Motion”), respectfully requesting entry of an order admitting *pro hac vice* Russell R. Johnson, III (the “Applicant”) to practice in the above referenced chapter 11 proceeding as counsel for Appalachian Power Company and Kentucky Power Company. In support of the Motion, the undersigned states as follows:

1. Applicant is an attorney and member of the Law Firm of Russell R. Johnson III, PLC, with the mailing address, telephone number and email address as follows:

Mailing Address:	Law Firm of Russell R. Johnson III, PLC 2258 Wheatlands Drive Manakin-Sabot, Virginia 23103
Telephone:	(804) 749-8861
Email:	russell@russelljohnsonlawfirm.com

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<sup>1</sup> The Debtors in these Chapter 11 cases and the last four digits of each Debtors’ taxpayer identification number are as follows: Cambrian Holding Company, Inc. (8203), Cambrian Coal, LLC (3394), Apex Energy, Inc. (3455), C.W. Augering, Inc. (2875), Marshall Resources, Inc. (9735), PLM Holding Company LLC (7427), Bear Branch LLC (0674), Clintwood Elkhorn Mining LLC (6910), Gatliff Coal LLC (5765), Perry County Coal LLC (4382), Ray Coal LLC (0981), Whitaker Coal (8270), Pike-Letcher Land LLC (8952), Premier Elkhorn Coal LLC (8951), Raven Rock Development LLC (1351), Rich Mountain Coal LLC (1974), S.T. & T. Leasing (0340), T.C. Leasing, Inc. (7705), and Shelby Resources, LLC (5085).

2. Applicant is an active member in good standing and currently eligible to practice law in the following state(s):

<b><u>STATE:</u></b>	<b><u>ADMISSION DATE:</u></b>	<b><u>BAR NO:</u></b>
Virginia	1990	31468

3. Attached to this Motion and incorporated herein as **Exhibit A** is the Affidavit of the Applicant (the “Affidavit”) in support of this Motion.

4. Attached to this Motion and incorporated herein as **Exhibit B** is the Applicant’s Certificate of Good Standing that was issued on August 19, 2021, by the highest court in the Commonwealth of Virginia, where Applicant is a resident.

5. Applicant is not currently and has never been disbarred, suspended from practice or subject to any disciplinary action by any court, state, territory or the District of Columbia.

6. By way of this Motion, Applicant consents to be subject to the jurisdiction and rules of the Kentucky Supreme Court governing professional conduct.

7. Applicant is an attorney of good moral and professional character and is eligible for admission to the Bar of this Court. Applicant is registered as an ECF participant in the United States District Courts for the Eastern District of Michigan, Western District of Pennsylvania and the United States Bankruptcy Court for the Eastern District of Virginia and has completed ECF training through those courts.

8. Applicant submits with this Motion the required *pro hac vice* fee of \$125.00.

WHEREFORE, the undersigned respectfully requests entry of an order, substantially in the form as the proposed order tendered contemporaneously with the

Motion, admitting Russell R. Johnson, III *pro hac vice* to appear before this Court in the above-referenced chapter 11 proceedings.

Respectfully submitted,

**STEPTOE & JOHNSON PLLC**

/s/ Nathaniel R. Kissel

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*Counsel for Appalachian Power Company and  
Kentucky Power Company*

**CERTIFICATE OF SERVICE**

I certify that on September 17, 2021, a true copy of the foregoing was filed and served electronically with the United States Bankruptcy Court for the Eastern District of Kentucky. Notice of this filing will be sent to the attorneys of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Nathaniel R. Kissel