

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

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

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*Local Counsel for New Life Transport Parts  
Center*

In re:

ALUMINUM SHAPES, L.L.C.,

Debtor.

Chapter 11

Case No. 21-16520 (JNP)

**APPLICATION FOR ADMISSION *PRO HAC VICE***

Melissa A. Pena, Esq. (“Movant”), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States District Court for the District of New Jersey, and a member with Norris McLaughlin, P.A., hereby moves the Court for an Order permitting John T. Piggins, Esq. to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey to represent New Life Transport Parts Center (“New Life”), a party in interest in this matter, pursuant to Local Bankruptcy Rule 9010-1. In support of relief requested herein, Movant states as follows:

**JURISDICTION**

This Court has jurisdiction to consider this application pursuant to 28 U.S.C. §§ 157 and 1334. Consideration of this application is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

### **RELIEF REQUESTED**

By this application, the Movant requests entry of an Order admitting *pro hac vice*, John T. Piggins, Esq. (the “Applicant”). The good standing of the Applicant is set forth in the Applicant’s certification which is submitted herewith (the “Certification”).

Applicant is a partner at Miller Johnson with an office at 45 Ottawa Ave SW, Suite 1100, Grand Rapids, Michigan 49503. As the Certification demonstrates, Applicant is a member in good standing of the Bar of the highest court in which he is admitted.

It is anticipated that Applicant will be active in the representation of this action on behalf of New Life. Accordingly, the Movant respectfully requests that the Court grant the *pro hac vice* admission of John T. Piggins, Esq. and that he be permitted to appear on New Life’s behalf in connection with this case.

No previous application for the relief sought herein has been made to this or any other court in connection with this proceeding.

### **WAIVER OF MEMORANDUM OF LAW**

Pursuant to Local Rule 9013-1, Movant respectfully requests that the Court waive the requirement that it file a memorandum of law in support of this Application. Movant respectfully submits that no memorandum of law is necessary because no novel issues of law are presented herein.

Dated: October 1, 2021

Respectfully Submitted,

/s/ Melissa A. Pena

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