

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

MOTION FOR ADMISSION *PRO HAC VICE* FOR SEAN T. GREECHER

NOW COMES Felton E. Parrish, an attorney and member in good standing of the North Carolina bar and admitted to practice before this Court and, pursuant to the admission requirements of Local Rule 2090-2(b) of this Court and Local Rule 83.1 of the United States District Court for the Western District of North Carolina, moves this Court for admittance *pro hac vice* of Sean T. Greecher (“Applicant”) for the purposes of representing Sander L. Esserman, the legal representative for persons that have not yet asserted an asbestos-related personal injury claim against the Debtor in the above-captioned case but may in the future assert such a claim (the “Future Claimants’ Representative”). In support of this Motion, the undersigned states as follows:

1. The Applicant is a partner with the law firm of Young Conaway Stargatt & Taylor, LLP (“Young Conaway”), Rodney Square, 1000 North King Street, Wilmington, Delaware 19801. Mr. Greecher’s phone number is (302) 571-6558. Mr. Greecher’s email address is sgreecher@ycst.com.

2. By order dated June 9, 2020, the Court approved the retention of Young Conaway as counsel for the Future Claimants’ Representative. By order dated February 5, 2021, the Court

¹ The last four digits of the Debtor’s taxpayer identification number are 8817. The Debtor’s address is 20 Moores Road, Malvern, Pennsylvania 19355.

approved the retention of Alexander Ricks PLLC as local co-counsel for the Future Claimants' Representative.

3. The Applicant has not been disciplined by any court or administrative body and does not have any pending disciplinary proceedings. Further, the Applicant has never had a *pro hac vice* admission or admission in any other bar revoked.

4. The Applicant understands *pro hac vice* admission is for this case only and does not constitute formal admission to the bar of this Court.

5. The undersigned movant will serve as co-counsel in this proceeding and will attend all hearings with the Applicant unless otherwise permitted by the Court.

6. The \$281 filing fee is being submitted with the filing of this Motion.

7. The Declaration of Applicant in support of this Motion is attached hereto and incorporated herein by reference.

WHEREFORE, the undersigned movant respectfully requests that this Court enter an order admitting Sean T. Greecher *pro hac vice* in this matter.

Dated: October 11, 2021

Respectfully submitted,

/s/ Felton E. Parrish

Felton E. Parrish

ALEXANDER RICKS PLLC

1420 East 7th Street, Suite 100

Charlotte, NC 28204

Telephone: 704-365-3656

Facsimile: 704-365-3676

Email: felton.parrish@alexanderricks.com

Counsel to the Future Claimants' Representative

EXHIBIT A

GREECHER DECLARATION

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re:

DBMP LLC,²

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**DECLARATION OF SEAN T. GREECHER IN SUPPORT
OF MOTION FOR ADMISSION *PRO HAC VICE***

I, SEAN T. GREECHER, hereby state as follows:

1. I am a partner with the law firm of Young Conaway Stargatt & Taylor, LLP, Rodney Square, 1000 North King Street, Wilmington, Delaware 19801. My phone number is (302) 571-6558. My email address is sgreecher@ycst.com.

2. I am admitted to practice before the United States District Court for the District of Delaware and the Supreme Court of the State of Delaware.

3. I have read the Motion for Admission *Pro Hac Vice* being filed contemporaneously herewith and know the contents thereof, and the statements contained therein are true and correct to the best of my knowledge.

4. I have never been disbarred or suspended in any court where I am admitted to practice.

5. I have not been, and am not currently, the subject of disciplinary action by the bar or courts of any state.

² The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

6. I have obtained and reviewed a copy of the Local Rules of this Court and am generally familiar with such rules.

7. I agree to be bound by the rules of this Court, and I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action.

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

Dated: October 11, 2021

/s/ Sean T. Greecher

Sean T. Greecher