

**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 ISEL M. PEREZ

I, Garland S. Cassada, am a partner with the law firm of Robinson, Bradshaw & Hinson, P.A. and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the “Local Bankruptcy Rules”) and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Isel M. Perez to practice in this Court for the purpose of representing DBMP LLC, as debtor and debtor in possession (the “Debtor”), in the above-captioned case. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Ms. Perez is an associate of the law firm of Jones Day, with her office located at 600 Brickell Avenue, Brickell World Plaza, Suite 3300, Miami, Florida 33131. Ms. Perez’s telephone number is (305) 714-9700, and her facsimile number is (305) 714-9799. Ms. Perez’s e-mail address is iperez@jonesday.com.

2. On January 23, 2020, the Debtor filed applications (together, the “Applications”) [Dkts. 16, 18] pursuant to section 327(a) of title 11 of the United States Code

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.

(the “Bankruptcy Code”) requesting the respective retentions of Jones Day as bankruptcy counsel and Robinson, Bradshaw & Hinson, P.A. as special counsel for asbestos claims estimation matters and local bankruptcy counsel. On January 24, 2020, the Court entered orders [Dkts. 34, 36] granting the Applications, subject to Local Bankruptcy Rule 9013-1(f). On March 17, 2020, the Court entered amended orders granting the Applications [Dkts. 201, 203].

3. As stated in the Declaration of Isel M. Perez, which is attached hereto as Exhibit A and incorporated herein by reference, Ms. Perez is a member in good standing of the Bar of the State of Florida and is admitted to practice in the United States District Court for the Southern District of Florida. Further, as set forth in her Declaration, Ms. Perez is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules.

4. With reference to all matters incident to this case, Ms. Perez submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of this chapter 11 case.

5. The \$281.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Isel M. Perez to appear before the Court *pro hac vice* in this case.

Dated: October 12, 2021
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada

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ATTORNEYS FOR DEBTOR AND DEBTOR
IN POSSESSION

Exhibit A

Declaration of Isel M. Perez

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

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**DECLARATION OF ISEL M. PEREZ
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Isel M. Perez, in support of the *Motion for Admission Pro Hac Vice for Isel M. Perez* (the “Motion”),² declares as follows:

1. My name is Isel M. Perez, and I am an associate with the law firm of Jones Day, with my office located at 600 Brickell Avenue, Brickell World Plaza, Suite 3300, Miami, Florida 33131. My telephone number is (305) 714-9700, and my facsimile number is (305) 714-9799. My e-mail address is iperez@jonesday.com.

2. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.

3. I am a member in good standing of the Bar of the State of Florida and I am admitted to practice before the United States District Court for the Southern District of Florida.

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

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.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

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

6. I am experienced in bankruptcy matters and am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules.

7. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of this chapter 11 case.

8. The law firm of Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246 is special counsel for asbestos claim estimation matters and local bankruptcy counsel for the Debtor in this case.

9. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: October 12, 2021

/s/ Isel M. Perez

Isel M. Perez

Exhibit B

Proposed Order

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

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

**ORDER ALLOWING ISEL M. PEREZ TO
APPEAR AS COUNSEL FOR DEBTOR, *PRO HAC VICE***

This matter having come before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the *Motion for Admission Pro Hac Vice for Isel M. Perez* (the “Motion”) filed by Garland S. Cassada for the admission *pro hac vice* of Isel M. Perez, to practice in this Court for the purposes of representing the above-captioned debtor and debtor in possession (the “Debtor”) in the above-captioned case as co-counsel together with counsel from the law firm of Robinson,

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.

Bradshaw & Hinson, P.A. who are admitted to practice in this Court; and it appearing to the Court, and the Court so finding, that for good cause shown the Motion should be granted;

NOW, THEREFORE, IT IS HERBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Isel M. Perez shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned chapter 11 case.

This Order has been signed electronically.
The Judge's signature and Court's seal appear at the top of the Order.

United States Bankruptcy Court