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Proposed Co-Counsel for LTL Management LLC

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

LTL MANAGEMENT LLC,1

Case No.: 21-30589 (MBK)

Chapter 11

Debtor.

APPLICATION TO ADMIT JOSEPH F. PACELLI PRO HAC VICE

TO: PARTIES ON THE COURT'S ELECTRONIC MAIL NOTICE LIST

PLEASE TAKE NOTICE that pursuant to Rule 2090-1 of the District of New Jersey

Local Bankruptcy Rules, Wollmuth Maher & Deutsch LLP, proposed co-counsel for Debtor,

LTL Management LLC (the "Debtor"), hereby makes the application before the United States

Bankruptcy Court for the District of New Jersey, for the entry of an Order admitting Joseph F.

Pacelli pro hac vice in the within proceeding to represent the Debtor.

The undersigned relies upon the Certifications of Joseph F. Pacelli and Paul R. DeFilippo in support of this application.

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

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The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no

objection to the within application is filed within seven (7) days, the application be granted and

the proposed form of Order be entered.

Dated: November 19, 2021 New York, New York

Respectfully submitted,

WOLLMUTH MAHER & DEUTSCH LLP

<u>/s/ Paul R. DeFilippo</u> Paul R. DeFilippo 500 Fifth Avenue, 12th Floor New York, New York 10110 -and-90 Washington Valley Road Bedminster, New Jersey 07921 Tel: (212) 382-3300 Fax: (212) 382-0050 Email: pdefilippo@wmd-law.com

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