

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE 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 KELLY E. FARNAN

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 Kelly E. Farnan, who has been retained as Ordinary Course Counsel pursuant to the *Order Authorizing the Retention and Compensation of Professionals Utilized by the Debtor in the Ordinary Course of Business* (Docket No. 200), to practice in this Court as needed for the purpose of assisting DBMP LLC, as debtor and debtor in possession (the “Debtor”), including in connection with discovery matters in the District of Delaware. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Ms. Farnan is a director of the law firm of Richards Layton & Finger, with her office located at One Rodney Square, 920 North King Street, Wilmington, Delaware 19801. Ms. Farnan’s telephone number is (302) 651-7705. Ms. Farnan’s e-mail address is farnan@rlf.com.

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. As stated in the *Declaration of Kelly E. Farnan*, which is attached hereto as Exhibit A and incorporated herein by reference, Ms. Farnan is a member in good standing of the Bar of the States of Delaware and New Jersey. Further, Ms. Farnan is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules pertinent to this matter.

3. With reference to all matters incident to this case, Ms. Farnan 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.

4. 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 Kelly E. Farnan to appear before the Court *pro hac vice* in this case.

Dated: January 4, 2022
Charlotte, North Carolina

Respectfully submitted,

/s/ Garland S. Cassada

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ATTORNEYS FOR DBMP LLC, DEBTOR
AND DEBTOR IN POSSESSION

Exhibit A

Declaration of Kelly E. Farnan

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
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In re

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Chapter 11

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**DECLARATION OF KELLY E. FARNAN
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Kelly E. Farnan, in support of the *Motion for Admission Pro Hac Vice for Kelly E.*

Farnan (the “Motion”),² declares as follows:

1. My name is Kelly E. Farnan, and I am a director with the law firm of Richards Layton & Finger, with my office located at One Rodney Square, 920 North King Street, Wilmington, Delaware 19801. My telephone number is (302) 651-7705. My e-mail address is farnan@rlf.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 Bars of the State of Delaware and New Jersey. I have never been disbarred or suspended in any court where I am admitted to practice.
4. I have not been the subject of disciplinary action by the bar or courts of any state.

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 shall have the meanings given to them in the Motion.

5. I am familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules pertinent to this matter.

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

7. I propose to practice in this Court as needed for the purposes of assisting the above-captioned debtor and debtor in possession, including in connection with discovery matters in the District of Delaware, as co-counsel with the law firm of Robinson, Bradshaw & Hinson, P.A., 101 North Tryon Street, Suite 1900, Charlotte, North Carolina 28246, which the Court has approved as special counsel for asbestos claim estimation matters and local bankruptcy counsel for the debtor and debtor in possession.

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

Dated: January 4, 2022

/s/ Kelly E. Farnan
Kelly E. Farnan

Exhibit B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
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**ORDER ALLOWING KELLY E. FARNAN 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 Kelly Farnan* (the “Motion”) filed by Garland S. Cassada, to practice in this Court as needed for the purposes of assisting the above-captioned debtor and debtor in possession (the “Debtor”) in the above-captioned case as co-counsel with counsel from the law firm of Robinson, 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;

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.

NOW, THEREFORE, IT IS HERBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Kelly E. Farnan 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