

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF KENTUCKY  
LEXINGTON**

<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>CAMBRIAN HOLDING COMPANY, INC. et al.,<sup>1</sup></b>	)	<b>Case No. 19-51200 (GRS)</b>
	)	
<b>Debtors.</b>	)	<b>Jointly Administered Honorable Gregory R. Schaaf</b>

**MOTION FOR *PRO HAC VICE* ADMISSION OF JAMES W. LANE, JR.**

I. Matthew Mains, counsel for Tramline, Inc., hereby move this Court for entry of an order admitting James W. Lane, Jr., a member with the law firm of Flaherty Sensabaugh Bonasso PLLC, 200 Capitol Street, Post Office Box 3843, Charleston, West Virginia 25338-3843, to appear *pro hac vice* before this Court on behalf of Tramline, Inc. in the above-referenced bankruptcy proceeding. In support of this motion, I. Matthew Mains, state as follows:

1. Mr. Lane is a member of the bar of the State of West Virginia and is admitted to practice before the Supreme Court of Appeals of West Virginia, and in the District Courts for the Northern District of West Virginia, Southern District of West Virginia, and the United States Bankruptcy Courts for the Northern District of West Virginia and Southern District of West Virginia.

2. Mr. Lane will tender payment of the prescribed fee to the Clerk of the Court of the Eastern District of Kentucky.

3. As stated in the affidavit in support of this Motion and the West Virginia

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<sup>1</sup> The Debtors in these Chapter 11 cases are (with the last four digits of their federal tax identification numbers in parentheses): Cambrian Holding Company, Inc. (8203), Cambrian Coal LLC (3394), Apex Energy, Inc. (3455), C.W. Augering, Inc. (2875), Marshall Resources Inc. (9735), PLM Holding Company LLC (7427), Bear Branch Coal LLC (0674), Clintwood Elkhorn Mining LLC (6910), Gatliff Coal LLC (5768), Perry County Coal LLC (4382), Ray Coal LLC (0981), Whitaker Coal LLC (8270), Pike-Letcher Land LLC (8952), Premier Elkhorn Coal LLC (8951), Raven Rock Development LLC (1351), Rich Mountain Coal LLC (1974), S.T.&T. Leasing, Inc. (0340), T.C. Leasing, Inc. (7705), and Shelby Resources, LLC (4085).

Certificate of Good Standing attached hereto as **Exhibit A** and **Exhibit B**, respectively and incorporated hereby by reference, Mr. Lane is in good standing and eligible to practice in all courts in which he is admitted to practice and consents to be subject to the jurisdiction and rules of the Supreme Court of Kentucky governing professional conduct.

WHEREFORE, I. Matthew Mains respectfully requests that the Court grant this *Motion for Pro Hac Vice Admission*, and enter an order admitting James W. Lane, Jr. to practice before this Court *pro hac vice* in the above captioned matter.

**Respectfully Submitted,**

**TRAMLIN, INC**

**By Counsel,**

/s/ I. Matthew Mains

I. Matthew Mains, Esq. (KYBAR# 94353)  
James. W. Lane, Jr. (*pro hac vice* pending)  
Flaherty Sensabaugh Bonasso PLLC  
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[mmains@flahertylegal.com](mailto:mmains@flahertylegal.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
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<b>In re:</b>	)	<b>Chapter 11</b>
	)	
<b>CAMBRIAN HOLDING</b>	)	<b>Case No. 19-51200 (GRS)</b>
<b>COMPANY, INC. et al.,<sup>2</sup></b>	)	
	)	<b>Jointly Administered</b>
<b>Debtors.</b>	)	<b>Honorable Gregory R. Schaaf</b>

**CERTIFICATE OF SERVICE**

The undersigned, counsel for Tramline, Inc., does hereby certify that I have filed the foregoing **Motion for Pro Hac Vice Admission of James W. Lane** and served via the Court's ECF system on January 6, 2022.

/s/ I. Matthew Mains  
I. Matthew Mains, Esq. (KYBAR# 94353)

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	)	
<b>Debtors.</b>	)	<b>Jointly Administered Honorable Gregory R. Schaaf</b>

**AFFIDAVIT IN SUPPORT OF MOTION FOR *PRO HAC VICE*  
ADMISSION OF JAMES W. LANE, JR.**

James W. Lanes, Jr., having been duly sworn, states as follows:

1. I am an attorney at the law firm Flaherty Sensabaugh Bonasso PLLC with the mailing address, telephone number and email address as follows:

Mailing address:	Flaherty Sensabaugh Bonasso PLLC 200 Capitol Street P.O. Box 3843 Charleston, WV 25338-3843
Telephone:	(304) 205-6373
Email:	jlane@flahertylegal.com

2. I am an active member in good standing and currently eligible to practice law in the State of West Virginia, admitted in 1994. My West Virginia Bar license is No.: 6483.

3. I am not currently and have never been disbarred, suspended from practice or subject to any disciplinary action by any court, state, territory, or the District of Columbia.

4. I have obtained a copy of and familiarized myself with the Joint Local Rules of Civil Practice for the United States District Court for the Eastern and Western Districts of Kentucky and

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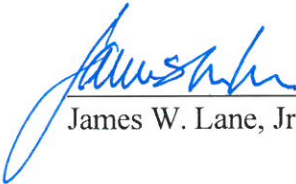
the Local Rules for the United States Bankruptcy Court for the Eastern District of Kentucky. I understand and agree that I will be bound by all Federal, State, and Local Rules applicable to the above-referenced cases.

5. I consent to be subject to the jurisdiction and rules of the Kentucky Supreme Court governing professional conduct.

6. I have received a Certificate of Good Standing from the West Virginia Supreme Court of Appeals which has been submitted to the Court.

7. I am an attorney of good moral and professional character and am eligible for admission to the Bar of this Court. I am registered as an ECF participant in the United States District Courts for the Northern District of West Virginia, Southern District of West Virginia, and the United States Bankruptcy Courts for the Northern District of West Virginia and the Southern District of West Virginia and have completed ECF training through those courts.

8. I will appear as co-counsel with Attorney I. Matthew Mains, an experienced lawyer admitted to practice before this Court.

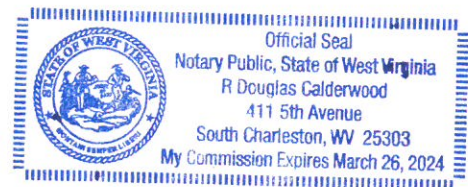
  
James W. Lane, Jr. Esq. (WV Bar# 6483)

STATE OF West Virginia:  
COUNTY OF Kanawha:

Taken, subscribed, and sworn to before me by James W. Lane, Jr., Esq., attorney at Flaherty Sensabaugh Bonasso PLLC, on JANUARY 6, 2022, in Kanawha County, West Virginia.

My commission expires: 3/26/2024.

Notary Public: 





# WEST VIRGINIA STATE BAR

## Certificate of Good Standing

James W. Lane Jr. - WWSB ID# 6483

This is to certify that, according to the records of the West Virginia State Bar, James W. Lane Jr., of Charleston, WV, was admitted to practice law by the Supreme Court of Appeals of WV on May 2, 1994.

According to the records of the West Virginia State Bar, as of January 6, 2022, James W. Lane Jr. is currently an Active Member in good standing with the West Virginia State Bar.



  
Anita R. Casey, Esquire  
Executive Director  
The West Virginia State Bar