

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

American Eagle Delaware Holding Company  
LLC, *et al.*,

Debtors.

Chapter 11

Case No. 22-10028 (JKS)

(Joint Administration Pending)

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 9010-1 and the attached certification, counsel moves for the admission *pro hac vice* of Timothy J. McKeon, Esq. of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. to represent UMB Bank, N.A., as indenture trustee in the above-captioned case.

Dated: January 14, 2022  
Wilmington, Delaware

/s/ Scott D. Cousins

Scott D. Cousins (No. 3079)

Scott D. Jones (No. 6672)

**COUSINS LAW LLC**

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**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 9010-1, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the bars of the State of Maine, the Commonwealth of Massachusetts and the State of New York, and submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules and with the Revised Standing Order for District Court Fund revised 8/31/16. I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court for the District Court.

Dated: January 14, 2022

/s/ Timothy J. McKeon

Timothy J. McKeon, Esq.

**MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY AND POPEO, P.C.**

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**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED counsel's motion for admission *pro hac vice* is granted.