Case 21-16520-JNP Doc 340 Filed 01/05/22 Entered 01/05/22 14:31:15 Desc Main Document Page 1 of 3

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)
OBERMAYER REBMANN MAXWELL & HIPPEL LLP
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Proposed Counsel to the Debtor
and Debtor in Possession
In re:
ALUMINUM SHAPES, L.L.C.,
Debtor.

Chapter 11

Case No. 21-16520-JNP

SUPPLEMENTAL CERTIFICATION OF WILLIAM F. SALDUTTI IV IN SUPPORT OF RETENTION OF OBERMAYER REBMANN MAXWELL & HIPPEL LLP

I, William F. Saldutti, IV, being of full age, certify as follows:

1. I am an associate at the law firm Obermayer Rebmann Maxwell & Hippel LLP

("Obermayer").

2. I submit this certification (the "Certification") in further support of Aluminum

Shapes, L.L.C.'s (the "Debtor") to retain Obermayer as counsel to the Debtor.

3. Prior to joining Obermayer I was an associate at Saldutti Law Group ("SLG").

4. With consultation from the Official Committee of Unsecured Creditors of the

Debtor (the "Committee"), the Debtor determined that it was in the best interest of the

Case 21-16520-JNP Doc 340 Filed 01/05/22 Entered 01/05/22 14:31:15 Desc Main Document Page 2 of 3

bankruptcy estate to challenge the alleged liens of certain pre-petition judgment creditors (the "Judgment Creditors").

5. In late September, it came to my attention that SLG represents one of the Judgment Creditors, Eastern Lift Truck Co., Inc. ("**Creditor**").

6. During my time at SLG, I never represented the Creditor directly or indirectly and I have never knowingly been exposed to any of the files of the Creditor. Instead, I concentrated the vast majority of my work at SLG on representing bank clients.

7. My last day at SLG was September 2, 2020 and during approximately my last six (6) weeks at SLG, my focus was on transitioning my existing files to other SLG attorneys and I did not take on any new work. Upon information and belief, the action SLG filed against the Debtor on behalf of the Creditor was commenced on September 1, 2020.

8. While it is my belief that I and Obermayer have no connection to the Creditor, out of an abundance of caution, the Debtor determined it should hire Kurtzman Steady, LLC as special counsel ("**Special Counsel**") and therefore spread out the actions against the Judgment Creditors between Obermayer, counsel to the Committee and Special Counsel.

9. Special Counsel is currently only involved in representing the Debtor in two adversary proceeding and the Debtor does not anticipate using Special Counsel for any other matters at this juncture, but reserves the right to use Special Counsel if appropriate in the future but only after further application and an Order from the Bankruptcy Court.

10. The Application to Employ Special Counsel is intended to be effective as of the filing date, November 9, 2021 and the proposed order submitted to the Bankruptcy Court authorizing the employment of Special counsel shall include a provision so stating and paragraph 1 of the proposed order shall also state "to the extent set forth herein."

2

Case 21-16520-JNP Doc 340 Filed 01/05/22 Entered 01/05/22 14:31:15 Desc Main Document Page 3 of 3

I certify under penalty of perjury that the above information is true.

Dated: January 4, 2022

<u>/s/ William F. Saldutti, IV</u> William F. Saldutti, IV, Esquire