

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Charlotte Division**

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| In re DBMP LLC, ¹ Debtor. | Chapter 11 Case No. 20-30080 (JCW) |
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MOTION FOR ADMISSION *PRO HAC VICE* FOR JESSICA A. SPROVTSOFF

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 Jessica A. Sprovtsoff to practice in this Court for the purpose of representing DBMP LLC, as debtor and debtor in possession (the “Debtor”), in the above-captioned case. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Jessica A. Sprovtsoff is a partner of the law firm of ArentFox Schiff with her office located at 350 South Main Street, Suite 210, Ann Arbor, MI 48104. Ms. Sprovtsoff’s telephone number is (734) 222-1518, and her facsimile number is (734) 222-1501. Ms. Sprovtsoff’s e-mail address is jessica.sprovtsoff@afslaw.com.

2. An Amended Order Approving Employment of Schiff Hardin² as Debtor’s Special Counsel Pursuant to Section 327(e) of the Bankruptcy Code Effective As of the Petition

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 Effective March 1, 2022, Schiff Hardin LLP merged with Arent Fox LLP, with the combined law firm called ArentFox Schiff LLP.

Date (Doc. 202) was entered on March 17, 2020, which supersedes the Court's Order Approving Employment of Schiff Hardin entered on January 24, 2020 (Doc. 35). Furthermore, the *Ex Parte* Order Authorizing Retention and Employment of Robinson, Bradshaw & Hinson, P.A. as Special Counsel for Asbestos Claims Estimation Matters and Local Bankruptcy Counsel for Debtor as of Petition Date (Doc. 36) was entered on January 24, 2020.

3. As stated in the Declaration of Jessica A. Sprovtsoff, which is attached hereto as Exhibit A and incorporated herein by reference, Ms. Sprovtsoff is a member in good standing of the State Bar of Michigan and is admitted to practice before the United States Court of Appeals for the Sixth Circuit and the United States District Courts of the Eastern District of Michigan and Western District of Michigan. Further, Ms. Sprovtsoff is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules pertinent to this matter.

4. With reference to all matters incident to this case, Ms. Sprovtsoff 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.

5. 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 Jessica A. Sprovtsoff to appear before the Court *pro hac vice* in this case.

Dated: April 18, 2023
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 Jessica A. Sprovtsoff

**IN THE UNITED STATES BANKRUPTCY COURT
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**DECLARATION OF JESSICA A. SPROVTSOFF
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Jessica A. Sprovtsoff, in support of the *Motion for Admission Pro Hac Vice for Jessica A. Sprovtsoff* (the "Motion"),² declares as follows:

1. My name is Jessica A. Sprovtsoff and I am a partner of the law firm of ArentFox Schiff with my office located at 350 South Main Street, Suite 210, Ann Arbor, MI 48104. My telephone number is (734) 222-1518, and my facsimile number is (734) 222-1501. My e-mail address is jessica.sprovtsoff@afslaw.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 State Bar of Michigan and am admitted to practice before the United States Court of Appeals for the Sixth Circuit and the United States District Courts of the Eastern District of Michigan and Western District of Michigan. I have never been disbarred or suspended in any court where I am admitted to practice.

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.

4. I have not been the subject of disciplinary action by the bar or courts of any state.

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 for the purposes of representing the above-captioned debtor and debtor in possession 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: April 18, 2023

/s/ Jessica A. Sprovtsoff
Jessica A. Sprovtsoff

Exhibit B

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
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**ORDER ALLOWING JESSICA A. SPROVTSOFF 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 Jessica A. Sprovtsoff* (the “Motion”) filed by Garland S. Cassada for the admission *pro hac vice* of Jessica A. Sprovtsoff, to practice in this Court for the purposes of representing 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, Jessica A. Sprovtsoff 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