

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION
www.flmb.uscourts.gov**

In re:
THE CENTER FOR SPECIAL NEEDS
TRUST ADMINISTRATION, INC.

Case No. 8:24-bk-00676-RCT
Chapter 11

Debtor.

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**MOTION FOR ADMISSION OF MARCOS ROSALES TO APPEAR *PRO HAC VICE*
AND ATTACHED DESIGNATION OF LOCAL COUNSEL**

Marcos Rosales, of Beck Redden LLP (“Movant”), pursuant to Local Rule 2090-1, moves this Court for admission to appear pro hac vice, in this case, and any related adversary proceedings, as counsel for American Momentum Bank, and states as follows:

1. Movant is an attorney licensed to practice law and is a member of good standing of the state bar in Texas.
2. Movant is also admitted to practice before and is in good standing with the United States District Court for the Northern District of Texas, Southern District of Texas, Eastern District of Texas, and Western District of Texas.
3. Movant designates Donald R. Kirk, a resident Florida attorney, Carlton Fields, P.A., who is qualified to practice in this Court and who consents to designation as local counsel. Local counsel’s written designation and consent to act is attached as Exhibit A.
4. Movant certifies that he has never been disbarred and is not currently suspended from the practice of law in the State of Texas or any other state, nor from any United States Bankruptcy Court, District Court, or Court of Appeals.

5. Movant certifies that he has not previously moved for admission pro hac vice to appear in a proceeding in the United States District Court for the Middle District of Florida, except that Movant applied for special admission in Case No. 8:24-cv-00438-SDM-AEP; *Chamberlin et al. v. Boston Finance Group, LLC, et al.*, in the United States District Court for the Middle District of Florida, Tampa Division. *Chamberlin* was filed on February 19, 2024 (exactly ten days after the Chapter 11 Petition was filed in this case) and was expressly based on the facts set forth in the Chapter 11 Petition and other first-day motions. Moreover, Movant applied for special admission to represent American Momentum Bank in *Chamberlin*, the same party as in this proceeding.

6. Movant certifies further that he will make himself familiar with and shall be governed by the local rules of this Court, the rules of professional conduct, and all other requirements governing the Middle District of Florida District Court and Tampa Division of the United States District Court.

7. Within fourteen days from the date of an order granting this motion, Movant shall pay to the Clerk of the United States District Court for the Middle District of Florida an Attorney Special Admission Fee in the amount of \$150.00 accompanied by a copy of the Court's order. Upon payment of the fee, Movant shall file a Notice of Compliance with the Clerk of the United States Bankruptcy Court.

WHEREFORE, Movant respectfully requests entry of an order authorizing his admission to practice and represent American Momentum Bank in this case and any related proceedings.

Dated: April 2, 2024

Respectfully submitted,

/s/ Marcos Rosales

Marcos Rosales

TX Bar No. 24074979

Federal Bar No. 1125440

(Pro Hac Vice Pending)

BECK REDDEN LLP

mrosales@beckredde.com

1221 McKinney, Suite 4500

Houston, TX 77010-2010

Telephone: (713) 951-3700

Facsimile: (713) 951-3720

ATTORNEY FOR

AMERICAN MOMENTUM BANK

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2024, I electronically filed the foregoing with the Clerk of Court by using the Court's CM/ECF system thereby serving all registered users in this case.

/s/ Marcos Rosales

Marcos Rosales

TX Bar No. 24074979

Federal Bar No. 1125440

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WRITTEN DESIGNATION AND CONSENT TO ACT AS LOCAL COUNSEL

I, Donald R. Kirk, an attorney qualified to practice in this Court, consent to designation as the local attorney for Marcos Rosales, and agree to serve as designee with whom the Court and opposing counsel may readily communicate regarding the conduct of this case and any related proceedings, and upon whom papers shall be served.

/s/ Donald Kirk

Donald R. Kirk
Florida Bar No. 105767
Carlton Fields, P.A.
4221 W. Boy Scout Blvd.
Ste. 1000
Tampa, FL 33607-5780
Telephone: (813) 229-4334
Facsimile: (813) 229-4133
Email: dkirk@carltonfields.com
ATTORNEY FOR
AMERICAN MOMENTUM BANK