

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

IN RE:

BIRD GLOBAL, INC., *et al.*,

Debtors.

Chapter 11

Case No. 23-20514-CLC

(Jointly Administered)

EX PARTE MOTION TO APPEAR PRO HAC VICE

I, Aimee Melich (“Movant”), a member in good standing of the bar of the United States District Court for the Southern District of Florida, with an office in this District and qualified to practice in this court, request that this court admit *pro hac vice* Lee W. Davis (“Visiting Attorney”), an attorney admitted to practice and currently in good standing in the bars of the United States District Courts for the Western District of Pennsylvania, Middle District of Pennsylvania, Northern District of West Virginia, the Southern District of West Virginia, Commonwealth of Pennsylvania, State of West Virginia and State of Michigan and qualified to practice in this court, who proposes to act as counsel for Alesia Truxell, as Administratrix of the Estate of Lawrence Chertik, III, and with Lawrence J. Chertik, Jr., as Parents of Lawrence Chertik, III, and Jacob Speller and Jennifer Vining (collectively “Clients”) in the cases listed above, and in any adversary proceedings therein in which the Visiting Attorney appears on behalf of such Clients.

I am aware that the local rules of this court require a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court to act as local counsel for such Client, unless the court specifically authorizes an attorney not so admitted to act as local counsel. I understand that local counsel is required to

participate in the preparation and presentation of, and accept service of all papers in, the case identified above and any adversary proceedings in which the Visiting Attorney appears on behalf of such Clients, and, for myself and the law firm of Aimee Melich Law, P.A. I accept those obligations.

The order granting this Motion will serve to admit the Visiting Attorney to practice in the cases noted above on behalf of the Clients and in any adversary proceedings in those cases in which the Visiting Attorney appears on behalf of such Clients. I understand that if I decline to serve as local counsel in any such adversary proceeding, separate local counsel must file an additional *Motion to Appear Pro Hac Vice*, and that absent such separate motion and an order of this court approving the same I will continue to act as local counsel for the Clients in all such proceedings.

The affidavit of the Visiting Attorney required under Local Rule 2090-1(C)(2) is attached hereto as **Exhibit "A"**.

WHEREFORE, upon the foregoing representations, Movant respectfully requests entry of an order, in the form attached hereto as **Exhibit "B"**, authorizing the Visiting Attorney to appear *pro hac vice* in these cases and in any adversary proceedings in these cases on behalf of the Client and indicating Movant and the law firm of Aimee Melich Law, P.A. as local counsel for the Client, and for such other and further relief as may be just.

Dated: May __, 2024

Respectfully submitted,

/s/ Aimee Melich
Aimee Melich

Aimee Melich Law, P.A.
Attorney for Creditors Chertik, Speller and
Vining
7480 Bird Rd, Suite 660

Miami, FL 33155
Tel: 786-583-8214
Aimee@MelichLaw.com

CERTIFICATE OF SERVICE

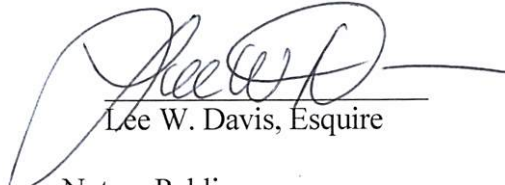
I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this ___ day of May 2024, via Notice of Electronic Filing (CM/ECF) upon counsel for Debtors and registered users in this case.

By: /s/ Aimee Melich
Aimee Melich, Esq.

Exhibit "A"

(Affidavit of Proposed Visiting Attorney)

until other local counsel is designated under this local rule (except where the motion is limited to a particular adversary proceeding). I further certify that I am familiar with and will be governed by the local rule of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of The Florida Bar.



Lee W. Davis, Esquire

SWORN TO AND SUBSCRIBED before me, a Notary Public

this 4th day of MAY, 2024.



Notary Public

My Commission Expires: 9-9-25

Commonwealth of Pennsylvania - Notary Seal
Diane J. Parks, Notary Public
Allegheny County
My commission expires September 9, 2025
Commission number 1218170
Member, Pennsylvania Association of Notaries

Exhibit “B”
(Proposed Order)

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ORDER ADMITTING ATTORNEY PRO HAC VICE

This matter came before the court without a hearing on the *Ex Parte Motion to Appear Pro Hac Vice* [Doc No.]. The Court having reviewed the motion and good cause appearing, it is **ORDERED** that Lee W. Davis (“Visiting Attorney”) may appear before this court *pro hac vice* as counsel for Alesia Truxell, as Administratrix of the Estate of Lawrence Chertik, III, and with Lawrence J. Chertik, Jr., as Parents of Lawrence Chertik, III, and Jacob Speller and Jennifer Vining (“Clients”) in these cases and in each adversary proceeding in these cases where Visiting Attorney appears on behalf of Clients, subject to the local rules of this Court.

Visiting Attorney shall include the certification required by Local Rule 9011-4(B)(2) in

all papers filed with this court. Visiting Attorney may apply to become a registered user of CM/ECF in this district with full filing privileges in this case and in any other case in which this court has entered an order admitting Visiting Attorney *pro hac vice*.

The following attorneys (“Local Attorney”) are designated as the attorney qualified to practice in this Court with whom the court and other counsel may readily communicate and upon whom papers may be served:

Aimee Melich, Esq., and
Aimee Melich Law, P.A.
Attorney for Creditors Chertik, Speller and Vining
7480 Bird Rd, Suite 660
Miami, FL 33155
Tel: 786-583-8214
Aimee@MelichLaw.com

Local Attorney shall act as the local attorney as required by Local Rule 2090-1(C)(2) in these cases and in each adversary proceeding in these cases in which the Visiting Attorney appears on behalf of the Clients. If Local Attorney declines to serve as the local attorney in any such adversary proceeding, a separate local attorney must file an additional *Motion to Appear Pro Hac Vice*, and absent such separate motion and an order of this Court approving the same Local Attorney will continue to act as local attorney for the Clients in all such proceedings.

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Submitted by:
Aimee Melich, Esq.

COPIES TO:
Lee W. Davis, Esq.

Attorney Aimee Melich shall serve a copy of this order on the United States Trustee, all parties who have filed appearances in this case, and all parties who have appeared in each applicable adversary proceeding and shall file a certificate of service thereof.