

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In Re:

Red Lobster Management, LLC, et al¹,

Case No. 6:24-bk-02486-GER
Chapter 11

Debtor.

**MOTION FOR ADMISSION OF ROBERT L. LEHANE TO APPEAR
PRO HAC VICE AND ATTACHED DESIGNATION OF LOCAL COUNSEL**

Robert L. LeHane (“**Movant**”), pursuant to Local Rule 2090-1(b), moves this Court for admission to appear pro hac vice, in this case, and any related adversary proceedings, as counsel for Blumenfeld Development Group, Kite Realty Group, Realty Income Corporation, Regency Centers, L.P., Tanger Properties, and Win Properties, Inc. 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 New York and New Jersey.

2. Movant is also admitted to practice before and is in good standing with the United States District Court for the Southern District of New York, the United States District Court for the Northern District of New York, the United States District Court for the Eastern District of New York, the United States District Court for the Western District of New York, and the United States District Court for the District of New Jersey.

3. Movant designates Steven J. Solomon, a resident Florida attorney, of GrayRobinson, 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 New York or New Jersey or any other state, nor from any United States Bankruptcy Court, District Court, or Court of Appeals.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number are Red Lobster Management LLC (6889); Red Lobster Sourcing LLC (3075); Red Lobster Supply LLC (9187); RL Kansas LLC (2396); Red Lobster Hospitality LLC (5297); Red Lobster Restaurants LLC (4308); RL Columbia LLC (7825); RL of Frederick, Inc. (9184); RL Salisbury, LLC (7836); RL Maryland, Inc. (7185); Red Lobster of Texas, Inc. (1424); Red Lobster of Bel Air, Inc. (2240); RLSV, Inc. (6180); Red Lobster Canada, Inc. (4569); and Red Lobster International Holdings LLC (4661). The Debtors’ principal offices are located at 450 S. Orange Avenue, Suite 800, Orlando, FL 32801.

5. Movant² 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.

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 the Orlando 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 and entry of the order granting special admission, Movant shall file a Notice of Compliance with the Clerk of the United States Bankruptcy Court for the Middle District of Florida.

WHEREFORE, Movant respectfully requests entry of an order authorizing his admission to practice and represent Blumenfeld Development Group, Kite Realty Group, Realty Income Corporation, Regency Centers, L.P., Tanger Properties, and Win Properties, Inc. in this case and any related proceedings.

Dated: May 23, 2024

/s/ Robert L. LeHane

New York Bar No. 4737250

New Jersey Bar No. 043371998

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175 Greenwich Street

New York, NY 10007

(212) 808-7573

Attorneys for Blumenfeld Development Group, Kite Realty Group, Realty Income Corporation, Regency Centers, L.P., Tanger Properties, and Win Properties, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 23, 2024, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that the foregoing was furnished via Notice of Electronic Filing through the Case Management/Electronic Case Filing system to those parties registered to receive electronic notices of filing in this case, including:

² Movant was previously admitted *pro hac vice* *In re FoodFirst Global Restaurants, Inc.*, 6:20-bk-02161-LVV (Bankr. M.D. Fla.), *In re Stein Mart, Inc.*, 3:20-bk-02387-JAF (Bankr. M.D. Fla.), and *In re Tijuana Flats Restaurants, LLC*, 3:24-bk-01128-BAJ (Bankr. M.D. Fla.).

Brooke L. Bean
Christopher K. Coleman
Jeffrey R. Dutson
Michael Fishel
Taeyeong Kim
Sarah L. Primrose
Paul Steven Singerman
W. Austin Jowers

Scott E. Bomkamp
Bryan E. Buenaventura
William J. Simonitsch
United States Trustee – JAX 11

and was provided by U.S. Mail to:

Red Lobster Management LLC
450 S. Orange Avenue, Suite 800
Orlando, FL 32801

GRAYROBINSON, P.A.
*Local Counsel for Blumenfeld Development Group, Kite
Realty Group, Realty Income Corporation, Regency Centers,
L.P., Tanger Properties, and Win Properties, Inc.*
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By: /s/ Steven J. Solomon

Steven J. Solomon
Florida Bar No. 931969

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WRITTEN DESIGNATION AND CONSENT TO ACT AS LOCAL COUNSEL

I, Steven J. Solomon, an attorney qualified to practice in this Court, consent to designation as the local attorney for Robert L. LeHane 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.

GRAYROBINSON, P.A.
Local Counsel for Blumenfeld Development Group, Kite Realty Group, Realty Income Corporation, Regency Centers, L.P., Tanger Properties, and Win Properties, Inc.
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By: /s/ Steven J. Solomon

Steven J. Solomon
Florida Bar No. 931969

PURSUANT TO LOCAL RULE 1001-2(g)(3) REGARDING SIGNATURES, STEVEN J. SOLOMON ATTESTS THAT CONCURRENCE IN THE FILING OF THIS PAPER HAS BEEN OBTAINED.