

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

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC

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

RED LOBSTER RESTAURANTS LLC,
RLSV, INC.,
RED LOBSTER CANADA, INC.,
RED LOBSTER HOSPITALITY LLC,
RL KANSAS LLC,
RED LOBSTER SOURCING LLC,
RED LOBSTER SUPPLY LLC,
RL COLUMBIA LLC,
RL OF FREDERICK, INC.,
RED LOBSTER OF TEXAS, INC.,
RL MARYLAND, INC.,
RED LOBSTER OF BEL AIR, INC.,
RL SALISBURY, LLC,
RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Jointly Administered with
Case No. 6:24-bk-02487-GER
Case No. 6:24-bk-02488-GER
Case No. 6:24-bk-02489-GER
Case No. 6:24-bk-02490-GER
Case No. 6:24-bk-02491-GER
Case No. 6:24-bk-02492-GER
Case No. 6:24-bk-02493-GER
Case No. 6:24-bk-02494-GER
Case No. 6:24-bk-02495-GER
Case No. 6:24-bk-02496-GER
Case No. 6:24-bk-02497-GER
Case No. 6:24-bk-02498-GER
Case No. 6:24-bk-02499-GER
Case No. 6:24-bk-02500-GER

Debtors.¹

**MOTION FOR ADMISSION OF
EDET D. NSEMO TO APPEAR *PRO HAC VICE*
AND ATTACHED DESIGNATION OF LOCAL COUNSEL**

Edet D. Nsemo of Tucker Ellis 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 Gordon Food Service Canada Ltd., 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 the State of Illinois.

¹ All references to “Debtor” include and refer to all of the above captioned debtors.

2. Movant is also admitted to practice before and is in good standing with the United States District Court for the following:

a. NONE.

3. Movant designates Megan W. Murray, a resident Florida attorney, of the law firm of Underwood Murray, 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 Illinois 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, other than in the following cases:

a. NONE.

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 Bankruptcy 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 Gordon Food Service Canada Ltd. in this case and any related proceedings

Dated: May 23, 2024.

Respectfully submitted,

/s/ Edet D. Nsemo

Edet D. Nsemo
Illinois Bar No. 6333141
Tucker Ellis LLP
233 South Wacker Drive, Suite 6950
Chicago, Illinois 60606
Telephone: (312) 256-9411
Email: edet.nsemo@tuckerellis.com
Attorneys for Gordon Food Service Canada Ltd.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing, that was filed with the Clerk of Court and has been furnished electronically to all those parties registered to receive service via CM/ECF on May 23, 2024.

/s/ Megan W. Murray

Megan W. Murray
Florida Bar No. 0093922

EXHIBIT A

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

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC

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

RED LOBSTER RESTAURANTS LLC,
RLSV, INC.,
RED LOBSTER CANADA, INC.,
RED LOBSTER HOSPITALITY LLC,
RL KANSAS LLC,
RED LOBSTER SOURCING LLC,
RED LOBSTER SUPPLY LLC,
RL COLUMBIA LLC,
RL OF FREDERICK, INC.,
RED LOBSTER OF TEXAS, INC.,
RL MARYLAND, INC.,
RED LOBSTER OF BEL AIR, INC.,
RL SALISBURY, LLC,
RED LOBSTER INTERNATIONAL HOLDINGS LLC,

Jointly Administered with
Case No. 6:24-bk-02487-GER
Case No. 6:24-bk-02488-GER
Case No. 6:24-bk-02489-GER
Case No. 6:24-bk-02490-GER
Case No. 6:24-bk-02491-GER
Case No. 6:24-bk-02492-GER
Case No. 6:24-bk-02493-GER
Case No. 6:24-bk-02494-GER
Case No. 6:24-bk-02495-GER
Case No. 6:24-bk-02496-GER
Case No. 6:24-bk-02497-GER
Case No. 6:24-bk-02498-GER
Case No. 6:24-bk-02499-GER
Case No. 6:24-bk-02500-GER

Debtors.²

WRITTEN DESIGNATION AND CONSENT TO ACT AS LOCAL COUNSEL

I, Megan W. Murray, an attorney qualified to practice in this Court, consent to designation as the local attorney for Edet D. Nsemo, and agrees 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/ Megan W. Murray
Megan W. Murray
Florida Bar. No. 0093922
UNDERWOOD MURRAY, P.A.
100 N. Tampa St., Suite 2325
Tampa, FL 33602

² All references to “Debtor” include and refer to all of the above captioned debtors.

Tel: (813) 540-8402 / Fax: (813) 553-5345
Email: mmurray@underwoodmurray.com

Local Counsel to Gordon Food Service Canada Ltd.

FILER'S ATTESTATION

Pursuant to Local Rule 1001-2(g)(3) regarding signatures, Megan W. Murray attests that concurrence in the filing of this paper has been obtained.

/s/ Megan W. Murray
Megan W. Murray