

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

|                              |   |                            |
|------------------------------|---|----------------------------|
| In re:                       | ) |                            |
|                              | ) | Case No. 6:24-bk-02486-GER |
| RED LOBSTER MANAGEMENT, LLC, | ) |                            |
| <i>et al.</i> <sup>1</sup> , | ) | Chapter 11                 |
|                              | ) |                            |
| Debtors.                     | ) | (Jointly Administered)     |

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

Jennifer D. Raviele (“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 bars in New York and Illinois.
2. Movant is also admitted to practice before and is in good standing with the United States District Court for the Southern and Eastern Districts of New York and the United States District Court for the Northern District of Illinois.
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**.

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<sup>1</sup> 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.

4. Movant certifies that she has never been disbarred and is not currently suspended from the practice of law in the States of New York or Illinois or any other state, nor from any United States Bankruptcy Court, District Court, or Court of Appeals.

5. Movant certifies that she 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 for the bankruptcy cases of *In re FoodFirst Global Restaurants, Inc.*, Case No. 6:20-bk-02161-LVV; *In re Stein Mart, Inc.*, Case No. 3:20-bk-02387-JAF; and *In re Tijuana Flats Restaurants, LLC*, Case No. 3:24-bk-01128-BAJ.

6. Movant certifies further that she will make herself 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 accompanied by a copy of the Court's order. Upon payment of the fee and entry of the order granting special admission, Movant shall submit the *Pro Hac Vice* registration with the Clerk of United States Bankruptcy Court for the Middle District of Florida.

**WHEREFORE**, Movant respectfully requests entry of an order authorizing her 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 28, 2024

/s/ Jennifer D. Raviele  
Jennifer D. Raviele  
New York Bar No. 4737250  
Illinois Bar No. 6334621  
**KELLEY DRYE & WARREN LLP**  
3 World Trade Center  
175 Greenwich Street  
New York, New York 10007  
Tel: (212) 808-7573  
Email: jraviele@kelleydrye.com

*Attorney 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 28, 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.

/s/ Steven J. Solomon  
Steven J. Solomon  
Florida Bar No. 931969  
**GRAYROBINSON, P.A**  
333 SE 2<sup>nd</sup> Avenue, Suite 3200  
Miami, FL 33131  
Tel: (305) 913-0367  
Email: steven.solomon@gray-robinson.com

*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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**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 Jennifer D. Raviele 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/ Steven J. Solomon  
Steven J. Solomon  
Florida Bar No. 931969  
**GRAYROBINSON, P.A**  
333 SE 2<sup>nd</sup> Avenue, Suite 3200  
Miami, FL 33131  
Tel: (305) 913-0367  
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PURSUANT TO LOCAL RULE 1001-2(g)(3) REGARDING SIGNATURES, STEVEN J. SOLOMON ATTESTS THAT CONCURRENCE IN THE FILING OF THE PAPER HAS BEEN OBTAINED.