## UNITED STATES DISTRICT BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION WWW.flmb.uscourts.gov

In re:

### RED LOBSTER MANAGEMENT LLC,<sup>1</sup>

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,

Debtors.

Chapter 11 Cases

Case No. 6:24-bk-02486-GER (Lead Case)

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-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-02499-GER Case No. 6:24-bk-02499-GER Case No. 6:24-bk-02500-GER

# MOTION FOR ADMISSION OF NANCY J. NEWMAN TO PRACTICE PRO HAC VICE AND DESIGNATION OF LOCAL COUNSEL

<sup>&</sup>lt;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.

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Nancy J. Newman of Hanson Bridgett LLP ("Movant"), pursuant to Local Rule 2090-

1(c), moves this court for admission pro *hac vice*, to appear in this and any related adversary proceeding as counsel for JCC California Properties, LLC, as follows:

1. Movant is an attorney licensed to practice law and is a member of good standing of the state bar for the State of California.

2. Movant is also admitted to practice before and is in good standing in the United States District Courts for the Northern, Central, Eastern, and Southern Districts of California, the Ninth Circuit Court of Appeals, and the United States Supreme Court.

3. Movant designates James A. Timko, a resident Florida attorney, of the law firm of Dean, Mead, Egerton, Bloodworth, Capouano & Bozarth, P.A., who is qualified to practice in this Court and who consents to designation as local counsel.

4. Movant certifies that she has never been suspended or disbarred from practice of law in any state or federal court.

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.

6. Movant certifies 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 Bankruptcy Court and the Orlando Division of the Bankruptcy 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

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United States Bankruptcy Court.

WHEREFORE, Movant respectfully requests entry of an order authorizing her admission to practice and represent JCC California Properties, LLC in this case and in any related adversary proceeding.

Dated: May 29, 2024

/s/ Nancy J. Newman

Nancy J. Newman California Bar No. 111878 HANSON BRIDGETT LLP 425 Market Street, 26th Floor San Francisco, CA 94105 Tel. (415) 777-3200 Email: <u>nnewman@hansonbridgett.com</u>

Attorneys for JCC California Properties, LLC

Filer's Attestation: Pursuant to Local Rule 1001-2(e)(3) regarding signatures, James A. Timko attests that concurrence in the filing of this paper has been obtained.

## **CONSENT TO ACT AS LOCAL COUNSEL**

I, James A. Timko, an attorney qualified to practice in this Court, consent to designation as the local attorney for Nancy J. Newman, of Hanson Bridgett LLP 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. Dated: May 29, 2024

/s/ James A. Timko

JAMES A. TIMKO, ESQ. Florida Bar No.: 0088858 DEAN, MEAD, EGERTON, BLOODWORTH, CAPOUANO & BOZARTH, P.A. Post Office Box 2346 Orlando, Florida 32802-2346 Phone: (407) 841-1200 Primary Email: <u>jtimko@deanmead.com</u> Secondary Email: <u>mgodek@deanmead.com</u>

Local Counsel for JCC California Properties, LLC

#### **CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2024 a true and correct copy of the foregoing has been

served via CM/ECF on all CM/ECF registered participants.

Dated: May 29, 2024

/s/ James A. Timko JAMES A. TIMKO, ESQ.