

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

In re:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC, *et al.*¹

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 INT'L HOLDINGS LLC,**

**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.

(Jointly Administration Pending)

**MOTION FOR ADMISSION OF JEREMY C. KLEINMAN TO APPEAR
PRO HAC VICE AND ATTACHED DESIGNATION OF LOCAL COUNSEL**

Jeremy C. Kleinman of FrankGecker LLP (“Movant”), pursuant to Local Rule 2090-1, moves this court for admission *pro hac vice*, to appear in this case, and any related adversary proceedings as counsel for PepsiCo Sales, Inc. and Pepsi-Cola Advertising and Marketing, Inc., and states as follows:

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.

1. Movant is an attorney licensed to practice law and is a member in good standing of the state bar of Illinois.

2. Movant is also admitted to practice before and is in good standing with the United States District Courts for the Northern District of Illinois and the Eastern District of Michigan, and the United States Courts of Appeals for the Seventh and Ninth Circuits.

3. Movant designates Jeffrey S. Ainsworth, a resident Florida attorney, of BransonLaw PLLC, 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, except as follows: Movant sought and obtained leave to appear *pro hac vice* in the bankruptcy case of Town Star Holdings, LLC (19-00667).

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, 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 PepsiCo Sales, Inc. and Pepsi-Cola Advertising and Marketing, Inc. in this case and any related proceedings.

Dated: June 6, 2024

/s/ Jeremy C. Kleinman

Jeremy C. Kleinman

Attorney Bar No. 6270080

jkleinman@fgllp.com

FRANKGECKER LLP

1327 West Washington Blvd., Suite 5 G-H

Chicago, Illinois 60607

Telephone: (312) 276-1400

Facsimile: (312) 276-0035

Attorney for PEPSICO SALES, INC. AND PEPSI-COLA ADVERTISING AND MARKETING, INC.

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
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Case No. 6:24-bk-02499-GER
Case No. 6:24-bk-02500-GER**

Debtors.

(Jointly Administration Pending)

WRITTEN DESIGNATION AND CONSENT TO ACT AS LOCAL COUNSEL

I, Jeffrey S. Ainsworth, an attorney qualified to practice in this Court, consent to designation as the local attorney for Joseph D. Frank, and agree to serve as designee with whom

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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/ Jeffrey S. Ainsworth
Jeffrey S. Ainsworth
Florida Bar No. 60769
jeffrey@bransonlaw.com
BRANSONLAW PLLC
1501 E. Concord St.
Orlando, Florida 32803
Telephone: (407) 476-9855
*Counsel for PepsiCo Sales, Inc. and
Pepsi-Cola Advertising and Marketing, Inc.*

PROOF OF SERVICE

A true and correct copy of the foregoing has been sent by the Court's Electronic Mail Notice List by operation of the Court's CM/ECF system on June 6, 2024.

/s/ Jeffrey S. Ainsworth
Jeffrey S. Ainsworth
Florida Bar No. 60769

FILER'S ATTESTATION

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

/s/ Jeffrey S. Ainsworth
JEFFREY S. AINSWORTH
Florida Bar No. 60769