

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

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

RED LOBSTER RESTAURANTS LLC,

*Jointly Administered with*

Case No. 6:24-bk-02487-GER

RLSV, INC.,

Case No. 6:24-bk-02488-GER

RED LOBSTER CANADA, INC.,

Case No. 6:24-bk-02489-GER

RED LOBSTER HOSPITALITY LLC,

Case No. 6:24-bk-02490-GER

RL KANSAS LLC,

Case No. 6:24-bk-02491-GER

RED LOBSTER SOURCING LLC,

Case No. 6:24-bk-02492-GER

RED LOBSTER SUPPLY LLC,

Case No. 6:24-bk-02493-GER

RL COLUMBIA LLC,

Case No. 6:24-bk-02494-GER

RL OF FREDERICK, INC.,

Case No. 6:24-bk-02495-GER

RED LOBSTER OF TEXAS, INC.,

Case No. 6:24-bk-02496-GER

RL MARYLAND, INC.,

Case No. 6:24-bk-02497-GER

RED LOBSTER OF BEL AIR, INC.,

Case No. 6:24-bk-02498-GER

RL SALISBURY, LLC,

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

RED LOBSTER INTERNATIONAL HOLDINGS LLC,

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

Debtors.

**EX PARTE MOTION FOR ADMISSION OF ANDREW D. SORKIN TO APPEAR  
PRO HAC VICE AND ATTACHED DESIGNATION OF LOCAL COUNSEL**

Andrew D. Sorkin, of Latham & Watkins LLP ("Movant"), pursuant to Local Rule 2090-1, moves this Court for admission to appear *pro hac vice*, in this bankruptcy proceeding and any related adversary proceedings, as counsel for Thai Union Group Public Company Limited ("Thai Union"), 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 New York and the District of Columbia.

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

District of Columbia and the United States District Court for the Southern District of Texas.

3. Movant designates Paul J. Battista, Esq., a resident Florida attorney, of the law firm of Venable LLP, 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 he has never been disbarred and is not currently suspended from the practice of law in the State of New York and the District of Columbia 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 within the past 36 months.

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.

8. 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 Thai Union in this bankruptcy proceeding and any related adversary proceedings.

Dated: June 13, 2024

**LATHAM & WATKINS LLP**  
555 Eleventh Street, NW, Suite 1000  
Washington, D.C. 20004-1304  
Telephone: (202) 637-2200  
Facsimile: (202) 637-2201

By: /s/ Andrew D. Sorkin, Esq.  
Andrew D. Sorkin  
[andrew.sorkin@lw.com](mailto:andrew.sorkin@lw.com)

Submitted by:

**VENABLE LLP**  
100 S.E. Second Street, 44<sup>th</sup> Floor  
Miami, FL 33131  
Telephone: (305) 349-2300

By: /s/ Paul J. Battista, Esq.  
Paul J. Battista, Esq.  
Florida Bar No. 884162  
[pjbattista@venable.com](mailto:pjbattista@venable.com)

**PROOF OF SERVICE**

I HEREBY CERTIFY that a true and accurate copy of the foregoing was filed with the Clerk of this Court and has been furnished electronically to those parties registered to receive service via this Court's Case Management / Electronic Case Files system in the above-captioned bankruptcy proceeding on June 13, 2024.

By: /s/ Paul J. Battista, Esq.  
Paul J. Battista, Esq.  
Florida Bar No. 884162  
[pjbattista@venable.com](mailto:pjbattista@venable.com)

**Exhibit “A”**

**Written Designation and Consent**

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

Debtors.

**WRITTEN DESIGNATION AND CONSENT TO ACT AS LOCAL COUNSEL**

I, Paul J. Battista, Esq., an attorney qualified to practice in this Court, consent to designation as the local attorney for Andrew D. Sorkin 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.

**VENABLE LLP**  
100 S.E. Second Street, 44<sup>th</sup> Floor  
Miami, FL 33131  
Telephone: (305) 349-2300

By: /s/ Paul J. Battista, Esq.  
Paul J. Battista, Esq.  
Florida Bar No. 884162  
[pjbattista@venable.com](mailto:pjbattista@venable.com)

*Filer's Attestation: Pursuant to Local Rule 1001-2(g)(3) regarding signatures, Paul J. Battista, Esq. attests that concurrence in the filing of this paper has been obtained.*