

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

DBMP LLC,¹

Debtor.

Chapter 11

Case No. 20-30080 (JCW)

OFFICIAL COMMITTEE OF ASBESTOS
PERSONAL INJURY CLAIMANTS, and
SANDER L. ESSERMAN, in his capacity as Legal
Representative for Future Asbestos Claimants, on
behalf of the estate of DBMP LLC

Plaintiffs,

v.

COMPAGNIE DE SAINT-GOBAIN S.A.,
SAINT-GOBAIN CORPORATION,
SAINT-GOBAIN DELAWARE CORPORATION,
CERTAINTEED LLC, CERTAINTEED
HOLDING CORPORATION, JOSEPH BONDI,
SEAN KNAPP, LAWRENCE RAYBURN,
MICHAEL STARCZEWSKI, VINCENT
DINENNA, ROBERT PANARO, DONALD
MELROY, PIERRE-ANDRÉ DE CHALENDAR,
BENOIT BAZIN, ANTOINE VIGNIAL, HUBERT
REICHARDT, DANIEL BIARNEIX, SREEDHAR
NATARAJAN, GUILLAUME TEXIER, THOMAS
KINISKY, CAROL GRAY, JOHN SWEENEY,
ERIC PLACIDET, MARK RAYFIELD, and
KEITH CAMPBELL,

Defendants.

Adv. Pro. No. 22-03001 (JCW)

1. The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19335.

MOTION FOR ADMISSION *PRO HAC VICE* FOR ERIC BLUMENFELD

I, Ashley S. Rusher, am a shareholder with the law firm Blanco Tackabery & Matamoros, P.A. and am a member in good standing of the bar of this Court. Pursuant to the admission requirements of Rule 2090-2 of the Local Rules of this Court (the “Local Bankruptcy Rules”) and Rule 83.1 of the Local Rules for Procedure and Practice of the United States District Court for the Western District of North Carolina, I move for the *pro hac vice* admission of Eric Blumenfeld to practice in this Court for the purpose of representing each of Compagnie de Saint-Gobain S.A., Pierre-André de Chalendar, Benoit Bazin, Antoine Vignial, Hubert Reichardt, Daniel Biarneix, Sreedhar Natarajan, and Guillaume Texier in the above-captioned adversary proceeding. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Mr. Blumenfeld is counsel to the law firm of Hughes Hubbard & Reed LLP, with his office located at One Battery Park Plaza, Floor 15, New York, New York 10004-1482. Mr. Blumenfeld’s mobile number is (347) 677-3651, and his office number is (212) 837-6118. Mr. Blumenfeld’s e-mail address is eric.blumenfeld@hugheshubbard.com.

2. As stated in the Declaration of Eric Blumenfeld, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Blumenfeld is a member in good standing of the Bar of the State of New York and the State of New Jersey and is admitted to practice in the United States District Courts for the Southern District of New York, the Eastern District of New York, the Western District of New York, the District of New Jersey, the Western District of Texas, and the Western District of Pennsylvania. He is also admitted to practice in the United States Tax Court and the United States Court of Appeals for the Third Circuit. Further, as set forth in his Declaration, Mr. Blumenfeld is experienced in bankruptcy matters and is familiar with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules.

3. With reference to all matters incident to this case, Mr. Blumenfeld agrees to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the United States Bankruptcy Court for the Western District of North Carolina and the North Carolina State Bar in all respects as if he were regularly admitted and licensed member of the Bar of North Carolina in good standing.

4. The \$300.00 fee for admission *pro hac vice* is being submitted concurrently with the filing of this Motion, consistent with Local Bankruptcy Rule 2090-2(c)(1).

WHEREFORE, the movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, admitting Eric Blumenfeld to appear before the Court *pro hac vice* in the above-captioned adversary proceeding.

Dated: June 27, 2024.

/s/ Ashley S. Rusher
Ashley S. Rusher (NC Bar No. 14296)
BLANCO TACKABERY & MATAMOROS, P.A.
P.O. Drawer 25008
Winston-Salem, NC 27114-5008
Telephone: (336) 293-9010
Facsimile: (336) 293-9030
Email: asr@blancolaw.com

EXHIBIT A

Declaration of Eric Blumenfeld

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**DECLARATION OF ERIC BLUMENFELD
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Eric Blumenfeld, in support of the *Motion for Admission Pro Hac Vice for Eric Blumenfeld* (the "Motion"),² declares as follows:

1. My name is Eric Blumenfeld, and I am a counsel to the law firm of Hughes Hubbard & Reed LLP, with my office located at One Battery Park Plaza, New York, New York 10004-1482. My mobile number is (347) 677-3651, and my office number is (212) 837-6118. My e-mail address is eric.blumenfeld@hugheshubbard.com.

2. I have read the Motion and understand the contents thereof. The matters and statements alleged therein are true and correct to the best of my knowledge, information and belief.

3. I am a member in good standing of the Bars of the State of New York and the State of New Jersey and am admitted to practice in the United States District Courts for the Southern District of New York, the Eastern District of New York, the Western District of New York, the District of New Jersey, the Western District of Texas, and the Western District of Pennsylvania. I am also admitted to the United States Tax Court and the United States Court of Appeals for the Third Circuit.

4. I have never been disbarred or suspended in any court in which I am admitted to practice.

5. I have not been the subject of disciplinary action by the bar or courts of any state.

6. I am experienced in bankruptcy matters. In particular, I was one of the attorneys who represented the trustee in the MF Global Inc. insolvency proceeding. I am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have

² Capitalized terms not otherwise defined herein have the meanings given to them in the Motion.

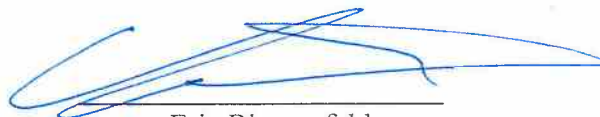
obtained a copy of the Local Bankruptcy Rules and am generally familiar with those rules.

7. I submit to the disciplinary jurisdiction of this Court for any misconduct alleged against me in the course of the matter captioned above.

8. The law firm of Blanco Tackabery & Matamoros, P.A. is local co-counsel for Compagnie de Saint-Gobain S.A., Pierre-André de Chalendar, Benoit Bazin, Antoine Vignial, Hubert Reichardt, Daniel Biarneix, Sreedhar Natarajan, and Guillaume Texier in the above-captioned adversary proceeding.

9. I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Date: June 27, 2024.



Eric Blumenfeld

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
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KEITH CAMPBELL,

Defendants.

**ORDER ALLOWING ERIC BLUMENFELD TO
APPEAR AS COUNSEL PRO HAC VICE**

This matter having come before the undersigned Judge of the United States Bankruptcy Court for the Western District of North Carolina, Charlotte Division, upon the *Motion for Admission Pro Hac Vice for Eric Blumenfeld* (the “Motion”) filed by Ashley S. Rusher for the admission *pro hac vice* of Eric Blumenfeld, to practice in this Court for the purposes of representing each of Compagnie de Saint-Gobain S.A., Pierre-André de Chalendar, Benoit Bazin, Antoine Vignial, Hubert Reichardt, Daniel Biarneix, Sreedhar Natarajan, and Guillaume Texier in the above-captioned adversary proceeding in the matter captioned above as co-counsel together with counsel from the law firm of Blanco Tackabery & Matamoros, P.A. who are admitted to practice in this Court; and it appearing to the Court, and the Court so finding, that for good cause shown the Motion should be granted;

NOW, THEREFORE, IT IS HERBY ORDERED THAT, pursuant to Rule 2090-2 of the Local Rules of Practice and Procedure of this Court, Eric Blumenfeld shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned adversary proceeding.

This Order has been signed electronically.
The Judge’s signature and Court’s seal appear at
the top of the Order.

United States Bankruptcy Court