

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

IN RE:

Chapter 11 Cases

RED LOBSTER MANAGEMENT LLC,

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 INTERNATIONAL HOLDINGS LLC,

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-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.

***EX PARTE MOTION FOR ADMISSION OF JUDITH ELKIN TO
APPEAR PRO HAC VICE AND ATTACHED DESIGNATION OF LOCAL COUNSEL***

Judith Elkin, of Pachulski Stang Ziehl & Jones 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 Official Committee of Unsecured Creditors (the “Committee”), and states as follows:

1. Movant is an attorney licensed to practice law and is a member in good standing of the Bars of the State of New York (admitted in 2004) and the State of Texas (admitted in 1982).

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

Texas, United States District Court for the Eastern District of Texas, United States District Court for the Northern District of Texas, the United States District Court for the Western District of Texas, the United States District Court for the Western District of Wisconsin, United States Court of Appeals for the Second Circuit, United States Court of Appeals for the Fifth Circuit, United States Court of Appeals for the Sixth Circuit, United States Court of Appeals for the Tenth Circuit, United States Court of Appeals for the Eleventh Circuit, and the Supreme Court for the United States.

3. Movant designates Jessey Krehl, a resident Florida attorney, of the law firm of Pack Law, 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**.

4. Movant certifies she has never been disbarred and is not currently suspended from the practice of law in the State of Texas, State of New York, 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 within the past 36 months.

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 \$150.00 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.

[Remainder of Page Intentionally Left Blank]

WHEREFORE, Movant respectfully requests entry of an order authorizing her admission to practice and represent the Committee in this bankruptcy proceeding and any related adversary proceedings.

Dated: September 3, 2024

Judith Elkin
PACHULSKI STANG ZIEHL & JONES LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Email: jelkin@pszjlaw.com

By: /s/ Judith Elkin

*Counsel to the Official Committee of Unsecured
Creditors*

Submitted by:

PACK LAW
51 Northeast 24th Street, Suite 108
Miami, Florida 33137
Telephone: (305) 916-4500

By: /s/ Jessey J. Krehl

Joseph A. Pack
Email: joe@packlaw.com
Florida Bar No. 117882

Jessey J. Krehl
Email: jessey@packlaw.com
Florida Bar No. 1025848

*Local Counsel to the Official Committee of
Unsecured Creditors*

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 September 3, 2024

By: /s/ Jessey J. Krehl

Jessey J. Krehl

Email: jessey@packlaw.com

Florida Bar No. 1025848

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, Jessey J. Krehl, an attorney qualified to practice in this Court, consent to designation as the local attorney for the Official Committee of Unsecured Creditors 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.

PACK LAW

51 Northeast 24th Street, Suite 108

Miami, Florida 33137

Telephone: (305) 916-4500

By: /s/ Jessey J. Krehl

Jessey J. Krehl

Email: jessey@packlaw.com

Florida Bar No. 1025848

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