

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re: )  
)  
MURRAY BOILER LLC ) Case No. 20-30609  
) Chapter 11  
Debtor )  
\_\_\_\_\_ )

**MOTION REQUESTING AUTHORIZATION OF JAMES  
RUGGERI TO APPEAR PRO HAC VICE PURSUANT  
TO LOCAL RULE 2090-2(C)**

Pursuant to Local Rule 2090-1, Christine L. Myatt of the law firm of Nexsen Pruet, PLLC hereby moves the Court for an order allowing James Ruggeri of the law firm of Shipman & Goodwin LLP (the "Applicant") to appear *pro hac vice* on behalf of Hartford Accident and Indemnity Company, First State Insurance Company, New England Insurance Company, and Twin City Fire Insurance Company in the above captioned adversary proceeding and/or in any other matters related to the underlying bankruptcy case. In support of this Motion and as set forth in the Affidavit attached hereto as Exhibit A, Ms. Myatt respectfully shows unto the Court as follows:

1. The Applicant is an attorney with the law firm of Shipman & Goodwin LLP. His office address is 1875 K Street N.W., Suite 600, Washington, D.C. 20006, telephone number is (202) 469-7752, and email address is JRuggeri@goodwin.com.
2. The Applicant is a member in good standing and admitted to practice in the District of Columbia and State of New York. The Applicant is not a member of the North Carolina State Bar and does not maintain a law office in North Carolina.
3. Mr. Ruggeri has previously filed for permission to appear *pro hac vice* before courts within the State of North Carolina in the following case: *In re Kaiser Gypsum Company, Inc.*, Case No. 16-31602 (Bankr. W.D.N.C.). Additionally, Mr.



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Ruggeri has a pending application with this Court: *In re: Aldrich Pump LLC*; 20-30608 (Bankr. W.D.N.C.).

4. The Applicant has not been disciplined by any court or administrative body and does not have any pending disciplinary proceedings. Further, the Applicant has never had a *pro hac vice* admission or admission in any other bar revoked.

5. The Applicant understands *pro hac vice* admission is for this case only and does not constitute formal admission to the bar of this Court.

6. The undersigned movant will serve as co-counsel in these proceedings and will attend all hearings with the Applicant unless otherwise permitted by the Court.

7. The \$281.00 filing fee is being submitted with the filing of this Motion.

8. The Declaration of Applicant in support of this Motion is attached hereto as Exhibit A and incorporated herein by reference.

9. The Applicant does hereby submit to the disciplinary jurisdiction of this Court for any misconduct in connection with matters for which she is specifically appearing.

10. Good cause exists for this Court to authorize the appearance of Applicant to appear in the above captioned adversary proceeding and/or in any other matters related to the underlying bankruptcy case *pro hac vice* pursuant to the proposed Order.

WHEREFORE, the undersigned respectfully requests that Applicant be authorized to appear in the above captioned adversary proceeding and/or in any other matters related to the underlying bankruptcy case *pro hac vice* in accordance with Local Rule 2090-2(c).

This the 26<sup>th</sup> day of August, 2020.

/s/ Christine L. Myatt

Christine L. Myatt

N.C. State Bar No. 10444

*Local Counsel for Hartford Accident and Indemnity Company, First State Insurance Company, New England Insurance Company, and Twin City Fire Insurance Company*

OF COUNSEL:

NEXSEN PRUET, PLLC

701 Green Valley Road, Suite 100

Post Office Box 3463

Greensboro, NC 27402

EXHIBIT A

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

|                   |   |                   |
|-------------------|---|-------------------|
| In re:            | ) |                   |
|                   | ) |                   |
| MURRAY BOILER LLC | ) | Case No. 20-30609 |
|                   | ) | Chapter 11        |
| Debtor            | ) |                   |
| _____             | ) |                   |

**DECLARATION IN SUPPORT OF MOTION OF JAMES RUGGERI  
TO APPEAR PRO HAC VICE**

James Ruggeri, of the firm of Shipman & Goodwin LLP pursuant to Local Rule 2090-2(c) of the United States Bankruptcy Court for the Western District of North Carolina, being first duly sworn deposes and says:

1. My name is James Ruggeri. I am a partner with the law firm of Shipman & Goodwin LLP and my business address is 1875 K Street N.W., Suite 600, Washington, D.C. 20006, telephone number is (202) 469-7752, and my email address is JRuggeri@goodwin.com.

2. I am submitting this affidavit in support of the Motion to Appear in this case as counsel for Hartford Accident and Indemnity Company, First State Insurance Company, New England Insurance Company, and Twin City Fire Insurance Company in the above captioned adversary proceeding and/or in any contested matters therein *pro hac vice*.

3. I have previously filed for permission to appear *pro hac vice* before courts within the State of North Carolina in the following case: *In re Kaiser Gypsum Company, Inc.*, No. 16-31602 (Bankr. W.D.N.C.) I have a pending application for admission *pro hac vice* with this Court: *In re: Aldrich Pump, LLC*; Case No: 20-30608 (Bankr. W.D.N.C.).

4. I am an attorney licensed to practice law in the District of Columbia and the State of New York. I have been a member in good standing of the District of Columbia Bar since 12/4/1991 and the State of New York since 01/22/1991. My District of Columbia Bar Number is: 431034. My State of New York Bar Number is: 2389575.

5. I am admitted to practice before the United States District Court for the District of Columbia, the United States Court of Appeal for the Eleventh Circuit, the United States Court of Appeals for the Ninth Circuit, and the United States Court of Appeals for the Fifth Circuit and am a member in good standing of each such court.

6. I have never been disciplined by any court or administrative body.

7. I will be assisted in this matter by local counsel, Christine L. Myatt, Esq. of the law firm Nexsen Pruet, PLLC, who is a member in good standing in the United States Bankruptcy Court for the Western District of North Carolina.

9. I certify that I have read and am familiar with the Local Bankruptcy Rules for the U.S. Bankruptcy Court for the Western District of North Carolina, the Federal Bankruptcy Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure and the Federal Rules of Evidence and hereby submit to the disciplinary jurisdiction of this Bankruptcy Court for any misconduct in connection with any matters for which I am specially appearing.

This 20<sup>th</sup> day of August, 2020.

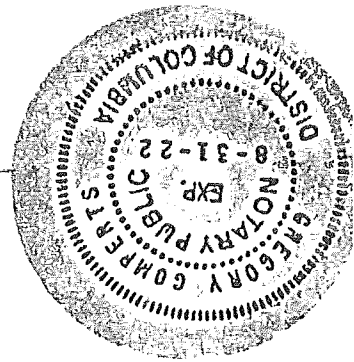
District of Columbia

Subscribed and sworn to before me, in my presence,  
this 20 day of August, 2020

Gregory Gomperts  
Gregory Gomperts, Notary Public, D.C.

My commission expires August 31, 2022.

James Ruggeri  
DC State Bar # 431034  
SHIPMAN AND GOODWIN LLP  
1875 K Street NW  
Washington, DC 20006  
(202) 469-7752



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|                   | ) | Chapter 11        |
| Debtors.          | ) |                   |
| _____             | ) |                   |

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 26, 2020, the foregoing **Motion for Admission *Pro Hac Vice* (James Ruggeri)** was filed with the Clerk of the Court using the CM/ECF system, and that a copy of the foregoing **Motion for Admission *Pro Hac Vice*** was served electronically on all parties registered with the CM/ECF system to receive notices for this case.

This the 26<sup>th</sup> day of August, 2020.

/s/ Christine L. Myatt  
Christine L. Myatt  
N.C. State Bar No. 10444  
*Local Counsel for Hartford Accident and  
Indemnity Company, First State Insurance  
Company, New England Insurance Company,  
and Twin City Fire Insurance Company*