

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

(Jointly Administered)

MOTION FOR ADMISSION *PRO HAC VICE* FOR MORGAN R. HIRST

I, John R. Miller, Jr., am a partner with the law firm of Rayburn Cooper & Durham, 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 Morgan R. Hirst to practice in this Court for the purpose of representing Aldrich Pump LLC and Murray Boiler LLC, as debtors and debtors in possession (together, the "Debtors"), in the above-captioned cases. In support of this Motion, the undersigned respectfully represents to the Court as follows:

1. Mr. Hirst is a partner of the law firm of Jones Day, with his office located at 77 West Wacker, Suite 3500, Chicago, Illinois 60601. Mr. Hirst's telephone number is (312) 269-1535, and his facsimile number is (312) 782-8585. Mr. Hirst's e-mail address is mhirst@jonesday.com.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.



2. As stated in the Declaration of Morgan R. Hirst, which is attached hereto as Exhibit A and incorporated herein by reference, Mr. Hirst is a member in good standing of the Bar of the State of Illinois and is admitted to practice in the United States District Court for the Northern District of Illinois. Further, as set forth in his Declaration, Mr. Hirst 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 these cases, Mr. Hirst submits to the disciplinary jurisdiction and the civil jurisdiction of, and agrees to be subject to the orders of, the United States Bankruptcy Court for the Western District of North Carolina for any alleged misconduct that occurs in the course of these chapter 11 cases.

4. The \$281.00 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 Morgan R. Hirst to appear before the Court *pro hac vice* in these chapter 11 cases.

Dated: September 4, 2020
Charlotte, North Carolina

Respectfully submitted,

/s/ John R. Miller, Jr.

C. Richard Rayburn, Jr. (NC 6357)
John R. Miller, Jr. (NC 28689)
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ATTORNEYS FOR DEBTORS AND
DEBTORS IN POSSESSION

Exhibit A

Declaration of Morgan R. Hirst

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

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(Jointly Administered)

**DECLARATION OF MORGAN R. HIRST
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Morgan R. Hirst, in support of the *Motion for Admission Pro Hac Vice for*

Morgan R. Hirst (the "Motion"),² declares as follows:

1. My name is Morgan R. Hirst, and I am a partner with the law firm of Jones Day, with my office located at 77 West Wacker, Suite 3500, Chicago, Illinois 60601. My telephone number is (312) 269-1535, and my facsimile number is (312) 782-8585. My e-mail address is mhurst@jonesday.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 Bar of the State of Illinois, and I am admitted to practice before the United States District Court for the Northern District of Illinois.

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

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

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 and am familiar with the provisions of the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure. I have obtained a copy of the Local Bankruptcy Rules and am generally familiar with such rules.

7. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the course of these chapter 11 cases.

8. The law firm of Rayburn Cooper & Durham, P.A., 227 West Trade Street, Suite 1200, Charlotte, North Carolina 28202 is co-counsel for the Debtors in these chapter 11 cases.

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

Dated: September 4, 2020

/s/ Morgan R. Hirst
Morgan R. Hirst

Exhibit B

Proposed Order

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

In re

ALDRICH PUMP LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 20-30608 (JCW)

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**ORDER ALLOWING MORGAN R. HIRST TO
APPEAR AS COUNSEL FOR DEBTORS, *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 Morgan R. Hirst* (the "Motion") filed by John R. Miller, Jr. for the admission *pro hac vice* of Morgan R. Hirst, to practice in this Court for the purposes of representing the above-captioned debtors and debtors in possession (together, the "Debtors") in

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers follow in parentheses): Aldrich Pump LLC (2290) and Murray Boiler LLC (0679). The Debtors' address is 800-E Beaty Street, Davidson, North Carolina 28036.

the above-captioned cases as co-counsel together with counsel from the law firm of Rayburn Cooper & Durham, 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, Morgan R. Hirst shall be, and hereby is, admitted *pro hac vice* to practice in this Court in the above-captioned chapter 11 cases.

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