

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

In re:)	
)	
ALDRICH PUMP, LLC,)	
)	
Debtor)	Chapter 11 Case No. 20-30608 (JCW)
)	
<hr style="width: 40%; margin-left: 0;"/>)	
In re:)	
)	
MURRAY BOILER, LLC)	Chapter 11 Case No. 20-30609 (JCW)
)	
Debtor¹)	
)	
<hr style="width: 40%; margin-left: 0;"/>		

MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE*

Adam L. Ross, of James, McElroy & Diehl, P.A. (“Movant”), hereby respectfully moves the Court pursuant to Local Bankruptcy Rule 2090-2 for admission *pro hac vice* of George R. Calhoun of Ifrah, PLLC, 1717 Pennsylvania Ave., NW, Washington D.C. 20006 (“Applicant”) for the purpose of representing TIG Insurance Company, for itself and as successor by merger to Mt. McKinley Insurance Company (formerly known as Gibraltar Casualty Company), Everest Reinsurance Company (formerly known as Prudential Reinsurance Company), Hudson Insurance Company, and Evanston Insurance Company, as successor to Associated International Insurance Company in the above-captioned consolidated cases and/or in any other matters related or associated to these bankruptcy cases. In support of this Motion, Movant states as follows:

1. Applicant is associated with Movant, who is a member in good standing of the North Carolina State Bar and who is admitted to practice before this Court. Movant has filed a notice of appearance and will serve as co-counsel in these proceedings.

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. Applicant is a member in good standing of the State Bars of Maryland and the District of Columbia. Applicant is duly authorized to practice law before the United States District Court for the District of Columbia, United States District Court for the District of Maryland, United States District Court for the Northern District of Illinois, the United States District Court for the Eastern District of Michigan, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the District of Columbia Circuit, and the United States Court of Federal Claims.

3. The Declaration of Applicant in support of this Motion is attached hereto and incorporated herein by reference.

4. The \$281.00 fee for admission *pro hac vice* is being submitted with the filing of this Motion.

WHEREFORE, Movant respectfully requests that this Court enter an Order admitting George R. Calhoun *pro hac vice* in this matter and/or in any other matters related to these bankruptcy cases in accordance with Local Rule 2090-2(c).

Respectfully submitted this 14th day of July, 2020.

JAMES, McELROY & DIEHL, PA.

/s/ Adam L. Ross

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*Attorneys for TIG Insurance Company,
Everest Reinsurance Company, and
Hudson Insurance Company*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing MOTION has this date been electronically filed with the Clerk of Court using the CM/ECF system, and served via that system on all parties receiving electronic notices in these Chapter 11 cases.

This the 14th day of July, 2020.

JAMES, McELROY & DIEHL, PA.

/s/ Adam L. Ross

Adam L. Ross, N.C. State Bar No. 31766

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Attorneys for TIG Insurance Company,

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Debtor)	
_____)	

**DECLARATION OF GEORGE CALHOUN IN SUPPORT OF MOTION FOR
ADMISSION TO PRACTICE *PRO HAC VICE***

George R. Calhoun, in support of the Motion for Admission to Practice *Pro Hac Vice*,
declares as follows:

1. I am a member of Ifrah PLL and practice out of Ifrah PLLC's office located at 1717 Pennsylvania Ave., NW, Washington, D.C. 20006.
2. I am a member in good standing of the State Bars of Maryland and the District of Columbia. I am duly authorized to practice law before the United States District Court for the District of Columbia, the United States District Court for the District of Maryland, the United States District Court for the Northern District of Illinois, the United States District Court for the Eastern District of Michigan, the United States Court of Appeals for the Third Circuit, the United States Court of Appeals for the Second Circuit, the United States Court of Appeals for the District of Columbia Circuit, and the United States Court of Federal Claims.
3. I am a member in good standing in all the courts where I have been admitted.
4. I have never been disbarred, suspended, or denied admissions to practice.

5. I agree to be bound by the rules of this Court and to comply with the Local Rules of this Court, and I submit to the disciplinary jurisdiction of this Court for any alleged misconduct in this action.

6. I declare under the penalty of perjury that the foregoing is true and correct.

Respectfully submitted this the 14th day of July, 2020.

By: /s/ George R. Calhoun
George R. Calhoun