

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 SALVATORE
M. DANIELE 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 Salvatore M. Daniele of the law firm of WilmerHale (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 Declaration 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 WilmerHale. His office address is 7 World Trade Center, 250 Greenwich Street, New York, NY 10007, telephone number is (212) 295-6292, and email address is sal.daniele@wilmerhale.com.
2. The Applicant is a member in good standing and admitted to practice in the 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. Daniele 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



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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 31st 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 SALVATORE M. DANIELE
TO APPEAR *PRO HAC VICE***

Salvatore M. Daniele, of the firm of WilmerHale 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 Salvatore M. Daniele. I am an associate with the law firm of WilmerHale and my business address is 7 World Trade Center, 250 Greenwich Street, New York, NY 10007, telephone number is (212) 295-6292, and my email address is sal.daniele@wilmerhale.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 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 State of New York. I have been a member in good standing of the State of New York Bar since 02/06/2019. My State of New York Bar Number is: 5662739.

5. I am admitted to practice before the United States District Court for the Eastern District of New York, the United States District Court for the Southern District of New York; and the New York State Supreme Court, Appellate Division, Second Department 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 28th day of August, 2020.

/s/

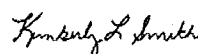
Salvatore M. Daniele

Signed on 2020/08/28 13:37:22 -0000

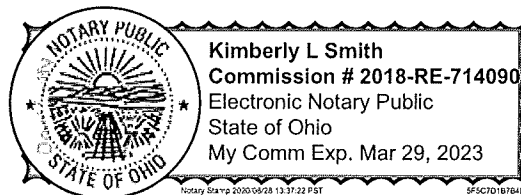
Salvatore M. Daniele
NY State Bar # 5662739
WILMERHALE
7 World Trade Center
New York, NY 10007
(212) 295-6292

Sworn to and subscribed before me
this the 28 day of August, 2020

Notary


Signed on 2020/08/28 13:37:22 -0000

My commission expires: March 29, 2023



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MURRAY BOILER LLC)	Case No. 20-30609
)	Chapter 11
Debtors.)	
_____)	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 31, 2020, the foregoing **Motion for Admission Pro Hac Vice (Salvatore M. Daniele)** 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 31st 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*