

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION**

In re:

FIBRANT, LLC, *et al.*,

Debtors,

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FIBRANT, LLC, EVERGREEN NYLON RECYCLING LLC; FIBRANT SOUTH CENTER, LLC; GEORGIA MONOMERS COMPANY, LLC; CHEMICANINVEST HOLDING, B.V., and AUGUSTA LIQUIDATIONS, LLC,

Plaintiffs,

v.

ACE PROPERTY & CASUALTY INSURANCE COMPANY, a corporation, UNITED STATES FIRE INSURANCE COMPANY, a corporation, CENTURY INDEMNITY COMPANY, a corporation, ADMIRAL INSURANCE COMPANY, a corporation, MT. MCKINLEY INSURANCE COMPANY, a corporation, COLUMBIA CASUALTY COMPANY, a corporation, CONTINENTAL CASUALTY COMPANY, a corporation, THE CONTINENTAL INSURANCE COMPANY, a corporation, CERTAIN UNDERWRITERS AT LLOYDS, LONDON, a corporation, CERTAIN LONDON MARKET COMPANIES, corporations, STARR INDEMNITY & LIABILITY COMPANY, a corporation, BERKSHIRE HATHAWAY SPECIALTY INSURANCE COMPANY, a corporation, FIRST STATE INSURANCE COMPANY, a corporation, ALBA GENERAL INSURANCE COMPANY LIMITED, a corporation, THE DOMINION INSURANCE COMPANY LIMITED, a corporation, EXCESS INS. CO. TO HFPI LTD., a corporation, ASSICURAZIONI GENERALI SPA, a

CHAPTER 11

CASE NO. 18-10274 (SDB)

(Jointly Administered)

ADVERSARY PROCEEDING  
NO. 19-01016 (SDB)



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corporation, HELVETIA ACCIDENT SWISS INSURANCE COMPANY LIMITED, a corporation, LONDON AND EDINBURGH GENERAL INSURANCE COMPANY LIMITED, a corporation, RIVER THAMES INSURANCE COMPANY LIMITED, a corporation, STRONGHOLD INSURANCE COMPANY LIMITED, a corporation, HARPER INSURANCE LTD., a corporation ARGONAUT NORTHWEST INSURANCE COMPANY, a corporation, DELTA-LLOYD NON-LIFE INSURANCE COMPANY LIMITED, a corporation, NATIONAL CASUALTY COMPANY, a corporation, NATIONAL CASUALTY COMPANY OF AMERCA LIMITED, a corporation, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, a corporation, LEXINGTON INSURANCE COMPANY, a corporation, THE NORTH RIVER INSURANCE COMPANY, a corporation, HOME INSURANCE COMPANY, a corporation; ALLSTATE INSURANCE, a corporation, PROTECTIVE NATIONAL INSURANCE COMPANY, a corporation, ZURICH INTERNATIONAL, a corporation, and LIBERTY MUTUAL, a corporation,

Defendants.

### **NOTICE OF SUBSTITUTION OF COUNSEL**

Notice is hereby given that, subject to approval by the Court, Rachel E. Hudgins of Fields Howell, LLP is substituted as counsel of record in place of Benjamin H. Brewton of Balch & Bingham, LLP for the following defendants:

- ALBA GENERAL INSURANCE COMPANY LIMITED
- THE DOMINION INSURANCE COMPANY LIMITED
- CATALINA WORTHING INSURANCE LTD F/K/A HFPI (AS PART VII TRANSFEREE OF (EXCESS INSURANCE COMPANY LTD AND/OR LONDON & EDINBURGH INSURANCE COMPANY LTD AS SUCCESSOR TO LONDON & EDINBURGH GENERAL INSURANCE COMPANY LTD))
- ASSICURAZIONI GENERALI SPA (UK BRANCH)
- HELVETIA ACCIDENT SWISS INSURANCE COMPANY LIMITED

- LONDON AND EDINBURGH GENERAL INSURANCE COMPANY LIMITED
- RIVER THAMES INSURANCE COMPANY LIMITED
- HARPER INSURANCE LTD F/K/A TUREGUM INS CO
- ARGONAUT NORTHWEST INSURANCE COMPANY
- DELTA-LLOYD NON-LIFE INSURANCE COMPANY LIMITED
- NATIONAL CASUALTY COMPANY
- NATIONAL CASUALTY COMPANY OF AMERICA LIMITED

Please remove Mr. Brewton from the service list as counsel of record for the above-listed defendants and address future correspondence to the following:

Rachel E. Hudgins  
**FIELDS HOWELL, LLP**  
1180 West Peachtree St. NW, Suite 1600  
Atlanta, Georgia 30309  
rhudgins@fieldshowell.com

Ronald D. Puhala  
**FORAN GLENNON PALANDECH PONZI &  
RUDLOFF P.C.**  
40 Wall Street, 54<sup>th</sup> Floor  
New York, NY 10005  
rpuhala@fgppr.com

I consent to being substituted.

Date: 11/20/19

  
\_\_\_\_\_  
Benjamin H. Brewton

I consent to the above substitution.

Date: 11/21/19

  
\_\_\_\_\_  
Rachel E. Hudgins

**CONSENT OF DESIGNATED LOCAL COUNSEL**

Mr. Puhala is admitted *pro hac vice* by order of this Court. (See ECF 32). Mr. Puhala hereby designates Ms. Hudgins as local counsel. Accordingly, Ms. Hudgins provides the below Consent of Designated Local Counsel.

I, Rachel E. Hudgins, Esq., designated local counsel for the subject case, agree to readily communicate with opposing counsel and the Court regarding the conduct of this case and accept papers when served and recognize the responsibility and full authority to act for and on behalf of

the clients in all proceeding related to this case, including hearings, pretrial conferences and trials, should Mr. Puhala fail to respond to any Court order for appearance or otherwise.

Georgia Bar No. 123342

Date: 11/21/19



\_\_\_\_\_  
Rachel E. Hudgins

Based on the foregoing, the undersigned respectfully request this Court's approval of the substitution of counsel and designation of local counsel.

Submitted this 21st of November, 2019.

**FIELDS HOWELL LLP**  
1180 W. Peachtree Street NW, Suite 1600  
Atlanta, Georgia 30303  
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s/ Rachel E. Hudgins, Esq.  
Georgia Bar No.: 123342

**FORAN GLENNON PALANDECH PONZI &  
RUDLOFF P.C.**  
40 Wall Street, 54<sup>th</sup> Floor  
New York, NY 10005  
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[rpuhala@fgppr.com](mailto:rpuhala@fgppr.com)

s/Ronald D. Puhala, Esq.  
Ronald D. Puhala (*Admitted Pro Hac Vice*)  
New Jersey Bar No.: 043741991

*Attorneys for Defendants*  
*ALBA GENERAL INSURANCE COMPANY LIMITED; THE DOMINION INSURANCE COMPANY LIMITED; CATALINA WORTHING INSURANCE LTD F/K/A HFPI (AS PART VII TRANSFEREE OF (EXCESS INSURANCE COMPANY LTD AND/OR LONDON & EDINBURGH INSURANCE COMPANY LTD AS SUCCESSOR TO LONDON & EDINBURGH GENERAL INSURANCE COMPANY LTD)); ASSICURAZIONI GENERALI SPA (UK BRANCI); HELVETIA ACCIDENT SWISS INSURANCE COMPANY LIMITED; LONDON AND EDINBURGH GENERAL INSURANCE COMPANY LIMITED; RIVER THAMES INSURANCE COMPANY LIMITED; HARPER INSURANCE LTD F/K/A TUREGUM INS CO; ARGONAUT*

*NORTHWEST INSURANCE COMPANY;  
ARGONAUT NORTHWEST INSURANCE  
COMPANY; DELTA-LLOYD NON-LIFE  
INSURANCE COMPANY LIMITED;  
NATIONAL CASUALTY COMPANY;  
NATIONAL CASUALTY COMPANY OF  
AMERICA LIMITED*

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Defendants.

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing NOTICE OF SUBSTITUTION OF COUNSEL has been served via the CM/ECF Electronic Filing System, which will send notice to all counsel of record.

This 21st day of November, 2019.

**FIELDS HOWELL LLP**  
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s/ Rachel E. Hudgins, Esq.  
Georgia Bar No.: 123342