KATTEN MUCHIN ROSENMAN LLP

Grace A. Thompson, Esq. (N.J. Bar No. 294072022) 50 Rockefeller Plaza New York, NY 10020-1605 Telephone: (212) 940-8800 Facsimile: (212) 940-8776

Attorneys for the Disinterested Directors of Thrasio Holdings, Inc.

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

THRASIO HOLDINGS, INC., et al.,

Debtors.1

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

APPLICATION FOR PRO HAC VICE ADMISSION OF JOHNJERICA HODGE

Anthony R. Horton and Stefan M. Selig, in their capacity as disinterested directors of Thrasio Holdings, Inc. (the "<u>Disinterested Directors</u>"), by and through their counsel, Katten Muchin Rosenman LLP, respectfully submit this application (the "<u>Application</u>"), for the *pro hac vice* admission of Johnjerica Hodge, Esq. and represent as follows:

1. On February 28, 2024, the Debtors filed voluntary petitions for relief under chapter

11 of the Bankruptcy Code, commencing the above captioned chapter 11 cases in the United States Bankruptcy Court for the District of New Jersey.

2. Johnjerica Hodge, Esq. is a member of the firm of Katten Muchin Rosenman LLP

and has represented the Disinterested Directors in connection with these matters. Because of her

¹ The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at https://www.kccllc.net/Thrasio. The Debtors' service address in these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.



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familiarity with the facts and circumstances relevant to the Disinterested Directors in these matters, the Disinterested Directors request that Ms. Hodge be allowed to appear *pro hac vice* in the within matters.

3. As set forth in the Certification of Ms. Hodge, annexed hereto as **Exhibit A**, Ms. Hodge is a member in good standing of the bar of the District of Columbia. Ms. Hodge is not under suspension or disbarment by any court.

4. If admitted *pro hac vice*, Ms. Hodge has represented that she will adhere to the disciplinary jurisdiction of this Court.

WHEREFORE, it is respectfully requested that the Court grant the Disinterested Directors' Application, pursuant to D.J. LBR 9010-1 and L. Civ. R. 101.1(c), to admit counsel *pro hac vice* in the above captioned matters.

Respectfully submitted,

KATTEN MUCHIN ROSENMAN LLP Attorneys for the Disinterested Directors

By: <u>/s/ Grace A. Thompson</u> Grace A. Thompson

Date: May 7, 2024

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KATTEN MUCHIN ROSENMAN LLP

Grace A. Thompson, Esq. (N.J. Bar No. 294072022) 50 Rockefeller Plaza New York, NY 10020-1605 Telephone: (212) 940-8800 Facsimile: (212) 940-8776

Attorneys for the Disinterested Directors of Thrasio Holdings, Inc.

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:

THRASIO HOLDINGS, INC., et al.,

Debtors.¹

Chapter 11

Case No. 24-11840 (CMG)

(Jointly Administered)

CERTIFICATION OF JOHNJERICA HODGE IN SUPPORT OF APPLICATION FOR <u>PRO HAC VICE ADMISSION OF JOHNJERICA HODGE</u>

Johnjerica Hodge, of full age, hereby certifies as follows:

1. I am an attorney-at-law duly admitted to practice before the courts of the District

of Columbia. I am a partner of the firm of Katten Muchin Rosenman LLP, counsel for Anthony

R. Horton and Stefan M. Selig, in their capacity as disinterested directors of Thrasio Holdings, Inc.

(the "Disinterested Directors"). I submit this Certification in support of the accompanying

Application for admission pro hac vice.

2. I was admitted to practice to the State of Texas in 2013, the District of Columbia in 2017, the United States Court of Appeals for the Fifth Circuit, the Federal Circuit, and the District of Columbia Circuit.

¹ The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at https://www.kccllc.net/Thrasio. The Debtors' service address in these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

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3. I am in good standing before the courts in which I am admitted, and I have not been disbarred, suspended or disciplined by any court or administrative body. The name and address of the office maintaining the roll of members in good standing for the State of Texas bar State Bar of Texas, Texas Law Center, 1414 Colorado Street, Austin, Texas 78701. The name and address of the office maintaining the roll of members in good standing for the District of Columbia is DC Bar, 901 4th Street, NW, Washington, DC 20001.

4. The Disinterested Directors filed the within Application for my *pro hac vice* admission in these matters due to my familiarity with the facts and circumstances relevant to their interests. If the Application is granted, I agree to abide by this Court's local rules and to submit myself to the disciplinary jurisdiction of this Court.

5. I hereby designate the following member of the bar of this Court with whom the Court and opposing counsel may communicate with regarding these cases: Grace A. Thompson, Esq.

6. For the foregoing reasons, I respectfully request my application for admission *pro hac vice* be granted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ Johnjerica Hodge

Johnjerica Hodge, Esq. KATTEN MUCHIN ROSENMAN LLP 1919 Pennsylvania Avenue NW Washington, DC 20006-3404 Telephone: (202) 625-3710 Facsimile: (202) 298-7570 Email: johnjerica.hodge@katten.com

DATED: May 7, 2024

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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY		
Caption in Compliance with D.N.J. LBR 9004-1(b) KATTEN MUCHIN ROSENMAN LLP Grace A. Thompson, Esq. 50 Rockefeller Plaza New York, NY 10020-1605 Telephone: (212) 940-8800 Facsimile: (212) 940-8776 Attorneys for the Disinterested Directors of Thrasio Holdings, Inc.		
In Re:	Case No.:	24-11840
THRASIO HOLDINGS, INC., et al.	Adv. No.:	
	Chapter:	11
Debtors ¹	Judge:	Christine M. Gravelle

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

^{1.} The last four digits of Debtor Thrasio Holdings, Inc.'s tax identification number are 8327. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at https://www.kccllc.net/Thrasio. The Debtors' service address in these chapter 11 cases is 85 West Street, 3rd Floor, Walpole, MA, 02081.

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This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that <u>Johnjerica Hodge, Esq.</u> be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may sign and file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders. Unless otherwise permitted by the Court, local counsel must attend all hearings and proceedings before the Court, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$250.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court District of New Jersey Martin Luther King, Jr. Federal Building 50 Walnut Street Newark, N.J. 07102 Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.