

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**MISSISSIPPI PHOSPHATES
CORPORATION**

**CASE NO. 14-51667-KMS
CHAPTER 11**

MOTION FOR ADMISSION OF COUNSEL *PRO HAC VICE*

COMES NOW William J. Little, Jr., local counsel for HC2 Holding, Inc. and its affiliates, and moves this Honorable Court for the *pro hac vice* admission of Brian S. Hermann, Diane Meyers and Julie Martinelli of the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, and in support therefor would show unto the Court as follows:

1. That Brian S. Hermann of the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, is an attorney in good standing licensed to practice in the courts of the State of New York, and has been so licensed since May 21, 1997, as shown on a Certificate of Good Standing attached hereto as Exhibit "A" and incorporated herein. The undersigned attorney states that his participation in the above styled and numbered matter is necessary.

2. That Diane Meyers of the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, is an attorney in good standing licensed to practice in the courts of the State of New York, and has been so licensed since June 10, 1992, as shown on a Certificate of Good Standing attached hereto as Exhibit "B" and incorporated herein. The undersigned attorney states that her participation in the above styled and numbered matter is necessary.

3. That Julie Martinelli of the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, is an attorney in good standing licensed to practice in the courts of the State of New York, and has been so licensed since January 24, 2006, as shown on a Certificate of Good Standing attached hereto as Exhibit "C" and incorporated herein. The undersigned attorney states that her participation in the

above styled and numbered matter is necessary.

WHEREFORE, the undersigned moves this Honorable Court to admit Brian S. Hermann, Diane Meyers and Julie Martinelli *pro hac vice* to represent HC2 Holding Inc. and its affiliates in the above styled and numbered proceeding, and to participate fully in all proceedings taking place before the Court in this matter.

THIS, the 6th day of November, 2014.

Respectfully submitted,

H2C HOLDING INC. AND ITS AFFILIATES

By Its Attorneys

By: /s/William J. Little, Jr.

William J. Little, Jr., MSB #1287, Local Counsel

/s/Brian S. Hermann

Brian S. Hermann

/s/Diane Meyers

Diane Meyers

/s/Julie Martinelli

Julie Martinelli

Lead Counsel:

Brian S. Hermann, Esq.

Diane Meyers, Esq.

Julie Martinelli, Esq.

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Local Counsel:

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Lentz & Little, P.A.
Post Office Box 927
Gulfport, MS 39502
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littlewj@bellsouth.net
wjlittleesq@gmail.com

CERTIFICATION

Brian S. Hermann, Diane Meyers and Julie Martinelli certify that they have read and are familiar with the *Uniform Local Rules of the United States Bankruptcy Courts for the Northern and Southern Districts of Mississippi*.

So certified this the 6th day of November, 2014.

/s/Brian S. Hermann
Brian S. Hermann

/s/Diane Meyers
Diane Meyers

/s/Julie Martinelli
Julie Martinelli

CERTIFICATE OF SERVICE

I certify that I caused a true and correct copy of the above and foregoing to be filed with the Court's ECF system which electronically served all counsel of record, including the following:

United States Trustee: USTPRegion05.JA.ECF@usdoj.gov
Stephen W. Rosenblatt: steve.rosenblatt@butlersnow.com
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David N. Usry: David.Usry@usdoj.gov
Christopher J. Steiskal: Christopher.J.Steiskal@usdoj.gov

I certify that I have this day mailed via U.S. Postal service, postage pre-paid, a copy of the foregoing to the following:

Robert B. McGinley, Jr.
McDowell Knight Roedder & Sledge, L.L.C.
Post Office Box 350
Mobile, AL 36601

SO CERTIFIED, this the 6th day of November, 2014.

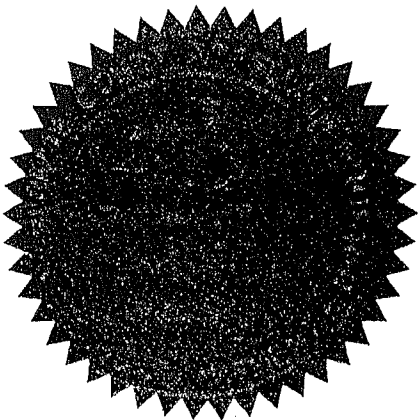
/s/William J. Little, Jr.
William J. Little, Jr.



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Brian Steven Germann** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 21st day of **May 1997**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on November 05, 2014.



Aprilanne Agostino

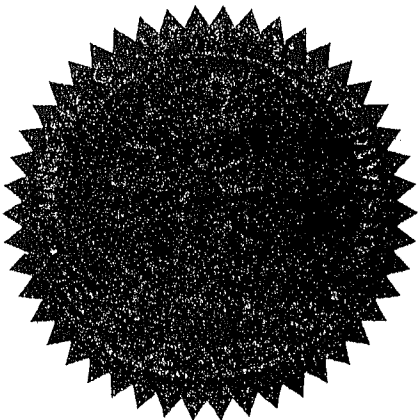
Clerk of the Court



Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Diane Meyers** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 10th day of **June 1992**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on November 05, 2014.



Aprilanne Agostino

Clerk of the Court

Appellate Division of the Supreme Court
of the State of New York
First Judicial Department

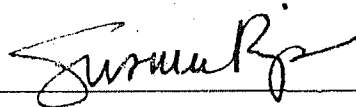
I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

JULIE MAE MARTINELLI

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on January 24, 2006, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

November 5, 2014



Clerk of the Court