Douglas T. Tabachnik LAW OFFICES OF DOUGLAS T. TABACHNIK, P.C. Woodhull House 63 W. Main Street, Suite C Freehold, New Jersey 07728 Ph.: (732) 780-2760 Fax: (732) 792-2761

ORIGINAL

and

Sander L. Esserman STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, a Professional Corporation 2323 Bryan Street, Suite 2200 Dallas, Texas 75201

Ph.: (214) 969-4900 Fax: (214) 969-4999



ATTORNEYS FOR BARON & BUDD, P.C., ON BEHALF OF CERTAIN SETTLING CLAIMANTS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

	_
In re) In a case under) Chapter 11
QUIGLEY COMPANY, INC.,) Case No. 04-15739 (SMB)
Debtor.	Civil Action No. 1:09-CV-00117 (CM)

MOTION FOR ADMISSION OF SANDER L. ESSERMAN PRO HAC VICE

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Douglas T. Tabachnik, a member in good standing of the bar of this Court hereby move for an Order allowing the admission pro hac vice of

Sander L. Esserman, Esq. Stutzman, Bromberg, Esserman & PLifka, A Professional Corporation 2323 Bryan Street, Suite 2200 Dallas, Texas 75201

Tel: (214) 969-4900 Fax: (214) 969-4999

Email: <u>esserman@sbep-law.com</u>

Sander L. Esserman is a member in good standing of the State Bar of Texas. There are no pending disciplinary proceedings against Sander L. Esserman in any State or Federal Court.

Respectfully submitted,

Douglas 1. Tabachnik LAW OFFICES OF

DOUGLAS T. TABACHNIK, P.C.

Woodhull House

63 W. Main Street, Suite C Freehold, New Jersey 07728

Ph: (732) 780-2760 Fax:(732) 792-2761

ATTORNEYS FOR BARON & BUDD, P.C., ON BEHALF OF CERTAIN SETTLING CLAIMANTS

Douglas T. Tabachnik LAW OFFICES OF DOUGLAS T. TABACHNIK, P.C. Woodhull House 63 W. Main Street, Suite C Freehold, New Jersey 07728 Ph.: (732) 780-2760

Fax: (732) 780-2760 Fax: (732) 792-2761

and

Sander L. Esserman STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, a Professional Corporation 2323 Bryan Street, Suite 2200 Dallas, Texas 75201

Ph.: (214) 969-4900 Fax: (214) 969-4999

ATTORNEYS FOR BARON & BUDD, P.C., ON BEHALF OF CERTAIN SETTLING CLAIMANTS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

) In a case under
In re) Chapter 11
) Case No. 04-15739 (SMB)
QUIGLEY COMPANY, INC.,)
) Civil Action No. 1:09-CV-00117 (CM)
Debtor.)
)
)

DECLARATION OF DOUGLAS T. TABACHNIK IN SUPPORT OF MOTION FOR ADMISSION OF SANDER L. ESSERMAN PRO HAC VICE

Douglas T. Tabachnik, hereby declares, under penalty of perjury, the following to be true and correct:

1. I am a member in good standing of the bar of the State of New York, and was admitted to practice in 1981. I was admitted to the bar of the United States District Court for the Southern District of New York in 1982, and am in good standing with this Court.

I respectfully submit this declaration in support of the motion pursuant to Local rule 1.3(c) of this Court for the admission *pro hac vice* of Sander L. Esserman, shareholder of the Dallas, Texas law firm of Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation. I am familiar with the proceedings in this case and will assist Mr. Esserman in the preparation of this case.

- 2. Mr. Esserman has been admitted to practice law in the State of Texas, and in the Northern Districts of Texas, and the United States Courts of Appeals for the Third and Fifth Circuits. Mr. Esserman is and has always been a member in good standing of the bars of the jurisdictions and courts in which he is admitted to practice. I have known Mr. Esserman since June of 2004 and believe him to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Accordingly, I am pleased to move the admission of Sander L. Esserman, *pro hac vice*.
- 3. Mr. Esserman's Certificate of Good Standing of the State Bar of Texas is attached hereto as Exhibit A.
 - 4. I respectfully submit a proposed order which is annexed hereto as Exhibit B.

WHEREFORE, I respectfully request that the Court issue an order admitting Sander L. Esserman to appear and to participate in all further proceedings in this case to

(This space intentionally left blank)

represent Baron & Budd, P.C., counsel on behalf of certain Settling Claimants in the above-referenced case, and that it order such other and further relief as to this Court seems just and proper.

Dated: February 3, 2009

Respectfully submitted, Law Offices of Douglas T. Tabachnik, P.C. Co-Counsel for Baron & Budd, P.C.

Douglas T. Tabachnik

Woodhull House

63 West Main Street, Suite C Freehold, New Jersey 07728

Ph: (732) 780-2760 Fax: (732) 792-2761

ATTORNEYS FOR BARON & BUDD, P.C. ON BEHALF OF CERTAIN SETTLING CLAIMANTS



STATE BAR OF TEXAS



Office of The Chief Disciplinary Counsel

January 27, 2009

RE: Mr. Sander L. Esserman

State Bar Number - 06671500

To Whom it May Concern:

This is to certify that Mr. Sander L. Esserman was licensed to practice law in Texas on November 01, 1976 and is an active member in good standing with the State Bar of Texas.

Good Standing means that the attorney is current on payment of Bar dues and attorney occupation tax; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension.

No disciplinary action involving professional misconduct has been taken against the attorney's law license. This certification expires 30 days from this date, unless sooner revoked or rendered invalid by operation of rule or law.

John A. Neal

Chief Disciplinary Counsel

N/dh

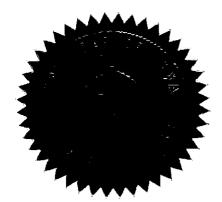


EXHIBIT B

Douglas T. Tabachnik LAW OFFICES OF DOUGLAS T. TABACHNIK, P.C. Woodhull House 63 W. Main Street, Suite C Freehold, New Jersey 07728 Ph.: (732) 780-2760

Fax: (732) 780-2760 Fax: (732) 792-2761

and

Sander L. Esserman STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, a Professional Corporation 2323 Bryan Street, Suite 2200 Dallas, Texas 75201

Ph.: (214) 969-4900 Fax: (214) 969-4999

ATTORNEYS FOR BARON & BUDD, P.C., ON BEHALF OF CERTAIN SETTLING CLAIMANTS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re) In a case under) Chapter 11) Case No. 04-15739 (SMB)
QUIGLEY COMPANY, INC., Debtor.) Civil Action No. 1:09-CV-00117 (CM)))

ORDER GRANTING ADMISSION TO PRACTICE PRO HAC VICE

Upon the Motion for Admission of Sander L. Esserman *Pro Hac Vice*, to represent Baron & Budd, P.C., counsel on behalf of certain Settling Claimants, in the above-referenced case, and said sponsor attorney's declaration in support;

¹ Counsel for the Settling Claimants represent thousands of asbestos personal injury claimants who settled their claims against Pfizer Inc., Quigley Company, Inc.'s (the "Debtor") non-debtor parent, prior to the commencement of the Debtor's Chapter 11 bankruptcy case. These personal injury claimants are referred to herein as the "Settling Claimants."

IT IS HEREBY ORDERED that

Sander L. Esserman, Esq.

Stutzman, Bromberg, Esserman & PLifka,

A Professional Corporation

2323 Bryan Street, Suite 2200

Dallas, Texas 75201

Tel: (214) 969-4900

Fax: (214) 969-4999

Email: esserman@sbep-law.com

is admitted to practice pro hac vice as counsel for Baron & Budd, P.C. in the above-

referenced case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court,

including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF

password at <u>nysd.uscourts.gov</u>. Counsel shall forward the pro hac vice fee to the Clerk of

the Court.

Dated:______, 2009 New York, New York

COLLEEN MCMAHON,

UNITED STATES DISTRICT JUDGE

2

Douglas T. Tabachnik LAW OFFICES OF DOUGLAS T. TABACHNIK, P.C. Woodhull House 63 W. Main Street, Suite C Freehold, New Jersey 07728 Ph.: (732) 780-2760

Fax: (732) 792-2761

and

Sander L. Esserman STUTZMAN, BROMBERG, ESSERMAN & PLIFKA, a Professional Corporation 2323 Bryan Street, Suite 2200 Dallas, Texas 75201

Ph.: (214) 969-4900 Fax: (214) 969-4999

ATTORNEYS FOR BARON & BUDD, P.C., ON BEHALF OF CERTAIN SETTLING CLAIMANTS

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

) In a case under
In re) Chapter 11
) Case No. 04-15739 (SMB)
QUIGLEY COMPANY, INC.,)
) Civil Action No. 1:09-CV-00117 (CM)
Debtor.)
)

CERTIFICATE OF SERVICE

The undersigned certifies that on the date hereon she caused a copy of the Motion for Admission of Sander L. Esserman *Pro Hac Vice*, together with the papers upon which

such motion is made, to be served on the parties on the annexed service list via first class mail, postage prepaid.

Dated: February 3, 2009

Danielle Petrics Legal Assistant

Service List

Service List		
Schulte Roth & Zabel LLP Attn: Lawrence V. Gelber, Esq. Michael L. Cook, Esq. Victoria Lepore, Esq. 919 Third Avenue New York, New York 10022 Email: lawrence.gelber@srz.com michael.cook@srz.com victoria.lepore@srz.com	Caplin & Drysdale, Chartered Attn: Ronald E. Reinsel One Thomas Circle, N.W. Washington, DC 20005 Email: rer@capdale.com	
Greenberg Traurig, LLP Attn: Bruce R. Zirinsky, Esq. John H. Bae, Esq. MetLife Building 200 Park Avenue New York, NY 10166 Email: zirinskyb@gtlaw.com baej@gtlaw.com	Togut, Segal & Segal LLP Attn: Albert Togut, Esq. Scott Ratner, Esq. One Penn Plaza, Suite 3335 New York, New York 10119 Email: altogut@TeamTogut.com seratner@TeamTogut.com	
Caplin & Drysdale, Chartered Attn: Elihu Inselbuch, Esq. 374 Park Avenue, 35 th Floor New York, New York 10152 Email: ei@capdale.com	Office of the United States Trustee Attn: Tracy Hope Davis 33 Whitehall Street, 21 st Floor New York, New York 10004 Email: <u>Greg.Zipes@usdoj.gov</u>	

200 Park Avenue New York, NY 10166 Email: <u>zirinskyb@gtlaw.com</u> <u>baej@gtlaw.com</u>	New York, New York 10119 Email: altogut@TeamTogut.com seratner@TeamTogut.com
Caplin & Drysdale, Chartered Attn: Elihu Inselbuch, Esq. 374 Park Avenue, 35 th Floor New York, New York 10152 Email: ei@capdale.com	Office of the United States Trustee Attn: Tracy Hope Davis 33 Whitehall Street, 21 st Floor New York, New York 10004 Email: Greg.Zipes@usdoj.gov
Brown Rudnick Berlack Israels LLP Attn: Edward S. Weisfelner, Esq. 7 Times Square New York, New York 10036 Email: eweisfelner@brownrudnick.com	Brown Rudnick Berlack Israels LLP Attn: Jeffrey L. Jonas, Esq. James W. Stoll, Esq. Gregory T. Arnold, Esq. One Financial Center Boston, MA 02111 Email: jjonas@brownrudnick.com jstoll@brownrudnick.com garnold@brownrudnick.com
Cadwalader, Wickersham & Taft LLP Attn: Gary D. Ticoll, Esq. Michele L. Angell, Esq. One World Financial Center New York, New York 10281 Email: gary.ticoll@cwt.com michele.angell@cwt.com	