UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF FLORIDA ORLANDO DIVISION www.flmb.uscourts.gov

In re:)
INGERSOLL FINANCIAL, LLC,) CASE No. 6:17-bk-07077-KSJ Chapter 11
Debtor.)
)

MOTION FOR ADMISSION OF DONALD W. FITZGERALD TO PRACTICE PRO HAC VICE, DESIGNATION OF LOCAL COUNSEL, AND CONSENT TO ACT

Donald W. Fitzgerald of Felderstein Fitzgerald Willoughby & Pascuzzi LLP ("Movant") pursuant to Local Rule 2090-1, moves this Court for admission pro hac vice, to appear in this, and any related adversary proceedings, as counsel for RS Lending, Inc. ("Creditor"), as follows:

- 1. Movant is an attorney licensed to practice law and is member of good standing of the state bar in the State of California.
- 2. Movant is also admitted to practice before and is in good standing with the following Courts:

United States District Court for the Eastern District of California
United States District Court for the Northern District of California
United States District Court for the Central District of California
United States District Court for the Southern District of California

- 3. Movant designates Christopher R. Thompson, a resident Florida attorney of the law firm of Burr & Forman, LLP, who is qualified to practice in this Court and who consents to designation as local counsel.
- 4. Movant certifies that he has never been disbarred and is not currently suspended from the practice of law in the State of California or any other state, nor from any United States Bankruptcy Court, District Court or Court of Appeals.

5. Movant certifies that he has not previously moved for admission pro hac vice to

appear in a proceeding in the United States District Court for the Middle District of Florida.

6. Movant certifies further that he will make himself familiar with and shall be

governed by the local rules of this Court, the rules of professional conduct and all other

requirements governing the Middle District of Florida District Court and the Orlando Division of

the United States District Court.

7. Within fourteen days from the date of an order granting this motion, Movant shall

pay to the Clerk of the United States District for the Middle District of Florida an Attorney

Special Admission Fee in the amount of \$150 accompanied by a copy of the Court's order.

Upon payment of the fee, Movant shall file a Notice of Compliance with the Clerk of the United

States Bankruptcy Court.

WHEREFORE, Movant respectfully requests entry of an order authorizing his/her

admission to practice and represent the Creditor/in this case and any related proceedings.

Dated: December 20, 2017

DONALD W. FITZGER

California State Bar No. 295348

FELDERSTEIN FITZGERALD WILLOUGHBY & PASCUZZI LLP

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Attorneys for RS Lending, Inc.

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CONSENT TO ACT AS LOCAL COUNSEL

I, Christopher Thompson, an attorney qualified to practice in this Court, consent to designation as the local attorney for Donald W. Fitzgerald of Felderstein Fitzgerald Willoughby & Pascuzzi LLP, and agree to serve as designee with whom the Court and opposing counsel may readily communicate regarding the conduct of this case and any related proceedings, and upon whom papers shall be served.

Christopher R. Thompson Florida Bar No. 93102

Email: crthompson@burr.com

Burr & Forman LLP

200 S. Orange Avenue, Suite 800

Orlando, FL 32801

Telephone: (407) 540-6600 Facsimile: (407) 540-6601 Local Counsel to the Creditor Case 6:17-bk-07077-KSJ Doc 30 Filed 12/21/17 Page 4 of 4

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 21, 2017, a true and correct copy of the foregoing

MOTION FOR ADMISSION OF DONALD W. FITZGERALD TO PRACTICE PRO HAC

VICE, DESIGNATION OF LOCAL COUNSEL, AND CONSENT TO ACT has been served

through the CM/ECF system to all registered CM./ECF recipients.

/s/ Christopher R. Thompson

Christopher R. Thompson