

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
www.flsb.uscourts.gov

In re: Chapter 11
CINEMEX HOLDINGS USA, INC. Case No. 20-14696-LMI
Reorganized Debtor (Formerly Jointly Administered Under
Lead Case: Cinemex USA Real Estate
Holdings, Inc., Case No. 20-14695-LMI)

MOTION TO APPEAR PRO HAC VICE

I, David L. Rosendorf (“Movant”), a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court, request that this court admit pro hac vice R. Campbell Hillyer, Esq. (“Visiting Attorney”), an attorney admitted to practice and currently in good standing in the United States District Court(s) for (i) Western, Middle and Eastern District of Tennessee, (ii) Northern District of Mississippi, (iii) Eastern and Western District of Arkansas, and qualified to practice in this court, who proposes to act as counsel for MOAC Mall Holdings, LLC (“Client”) in the case listed above, and in any adversary proceedings therein in which the Visiting Attorney appears on behalf of such Client(s).

I am aware that the local rules of this court require a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court to act as local counsel for such Client(s), unless the court specifically authorizes an attorney not so admitted to act as local counsel. I understand that local counsel is required to participate in the preparation and presentation of, and accept service of all papers in, the case

identified above and any adversary proceedings in which the Visiting Attorney appears on behalf of such Client(s).

I am a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court, and agree to act as local counsel for the above-referenced Client in this case and in any adversary proceedings in this case in which the Visiting Attorney appears on behalf of the Client. I understand that I am required to participate in the preparation and the presentation of the case above and any such adversary proceedings and to accept service of all papers served in such case and proceedings.

The order granting this Motion will serve to admit the Visiting Attorney to practice in the case noted above on behalf of the Client(s) and in any adversary proceedings in that case in which the Visiting Attorney appears on behalf of such Client(s). I understand that if I decline to serve as local counsel in any such adversary proceeding, separate local counsel must file an additional Motion to Appear Pro Hac Vice, and that absent such separate motion and an order of this court approving the same I will continue to act as local counsel for the Client(s) in all such proceedings.

The affidavit of the Visiting Attorney required under Local Rule 2090-1(C)(2) is filed concurrently herewith.

WHEREFORE, upon the foregoing representations, Movant respectfully requests an order of this court authorizing the Visiting Attorney to appear pro hac vice in this case and in any adversary proceedings in this case on behalf of the Client(s) and indicating Movant as local counsel for the Client(s), and for such other and further relief as may be just.

Dated: October 22, 2021.

KOZYAK TROPIN & THROCKMORTON, LLP
2525 Ponce de Leon Boulevard, 9th Floor
Coral Gables, Florida 33134
Tel: (305) 372-1800
Fax: (305) 372-3508

/s/ David L. Rosendorf
David L. Rosendorf
FL Bar No. 996823
dlr@kttlaw.com

Counsel for MOAC Mall Holdings, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on October 22, 2021, through the Court's Case Management/Electronic Case Filing system, which sent automatic email notices of electronic filing to all parties indicated on the electronic filing receipt.

/s/ David L. Rosendorf
David L. Rosendorf

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Reorganized Debtor (Formerly Jointly Administered Under
Lead Case: Cinemex USA Real Estate
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DECLARATION OF CAM HILLYER, ESQ.

I, R. Campbell Hillyer, am a member in good standing of the bar of the States of Tennessee and Mississippi. I am a member in good standing of the bar of the United States District Courts for (i) Western, Middle and Eastern District of Tennessee, (ii) Northern District of Mississippi, (iii) Eastern and Western District of Arkansas, but am not admitted to the bar of the United States District Court for the Southern District of Florida. I certify that I have never been disbarred, that I am not currently suspended from the practice of law in the State of Florida or any other state, and that I am not currently suspended from the practice of law before any United States Court of Appeals, United States District Court, or United States Bankruptcy Court.

I hereby request authority to appear *pro hac vice* in this case and in any adversary proceedings in this case on behalf of MOAC Mall Holdings, LLC (“Client”). I designate David L. Rosendorf (“Local Counsel”), who is qualified to practice in this court, as local counsel for the Client. I understand that Local Counsel is required to participate in the preparation and the presentation of the case above and any adversary proceedings in which I appear on behalf of such Client, and accept service of all papers served in such case and proceedings, unless and until other

local counsel is designated and accepts such designation by filing a separate *Motion to Appear Pro Hac Vice* on my behalf.

I certify that I am familiar with and shall and shall be governed by the local rules of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of the Florida Bar.



R. Campbell Hillyer

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CINEMEX HOLDINGS USA, INC.	Case No. 20-14696-LMI
Reorganized Debtor	(Formerly Jointly Administered Under Lead Case: Cinemex USA Real Estate Holdings, Inc., Case No. 20-14695-LMI)

ORDER ADMITTING ATTORNEY PRO HAC VICE

This matter came before the court without a hearing on the Motion to Appear Pro Hac Vice [ECF No. 276]. The court having reviewed the motion and good cause appearing, it is

ORDERED that R. Campbell Hillyer, Esq. (“Visiting Attorney”) may appear before this court *pro hac vice* as counsel for MOAC Mall Holdings, LLC (“Client”) in this case and in each adversary proceeding in this case where Visiting Attorney appears on behalf of Client, subject to the local rules of this court. Visiting Attorney shall include the certification required by Local Rule 9011-4(B)(2) in all papers filed with this court.

Visiting Attorney may apply to become a registered user of CM/ECF in this district with full filing privileges in this case and in any other case in which this court has entered an order admitting Visiting Attorney *pro hac vice*.

The following attorney (“Local Attorney”) is designated as the attorney qualified to practice in this court with whom the court and other counsel may readily communicate and upon whom papers may be served:

David L. Rosendorf
Kozyak Tropin & Throckmorton, LLP
2525 Ponce de Leon Boulevard, 9th Floor
Coral Gables, FL 33134
Tel: (305) 372-1800
Email: dlr@kttlaw.com

Local Attorney shall act as the local attorney as required by Local Rule 2090-1(C)(2) in this case and in each adversary proceeding in this case in which the Visiting Attorney appears on behalf of the Client(s). If Local Attorney declines to serve as the local attorney in any such adversary proceeding, a separate local attorney must file an additional *Motion to Appear Pro Hac Vice*, and absent such separate motion and an order of this court approving the same Local Attorney will continue to act as local attorney for the Client(s) in all such proceedings.

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SUBMITTED BY:

David L. Rosendorf
Kozyak Tropin & Throckmorton, LLP
2525 Ponce de Leon Boulevard, 9th Floor
Coral Gables, FL 33134
Tel: (305) 372-1800
Email: dlr@kttlaw.com
Counsel for MOAC Mall Holdings, LLC

COPIES FURNISHED TO:

David L. Rosendorf, who shall serve copies on all interested parties and file a certificate of service.