

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION**

In re:

Progressive Acute Care, LLC, et al
(Debtors)

Case No. 16-50740

Chapter 11

Jointly Administered

EX PARTE MOTION TO APPEAR PRO HAC VICE

COMES NOW, the Official Committee of Unsecured Creditors (the “Committee”) who, pursuant to Bankruptcy Court Local Rule 2090-1 and District Court Local Rule 83.2.6.W, respectfully state as follows:

1.

J. Eric Lockridge of the law firm Kean LLP (“Kean Miller”), who is licensed to practice law in the State of Louisiana and before this Court, has been asked to serve as co-counsel for the Committee in the above-captioned matter. A formal application for the Committee to employ Kean Miller LP will follow soon.

2.

The Committee also seeks to engage additional counsel on its behalf in this matter, specifically, **Boris I. Mankovetskiy** (the “Applicant”) of the law firm Sills Cummins & Gross, P.C., One Riverfront Plaza, Newark, NJ, 07102, whose telephone number is 973.643.7000, and whose email address is bmankovetskiy@sillscummis.com. A formal application for the Committee to employ Applicant will follow soon.

3.

An oath of the Applicant confirming that he is a member in good standing of the State Bars of New Jersey and New York, and that no disciplinary proceedings or criminal charges have been instituted against him is attached as **Exhibit “A.”** A certificate of good standing from the United States District Court of Southern District Court of New York is attached as **Exhibit “B.”**

PRAYER

WHEREFORE, the Official Committee of Unsecured Creditors requests that **Andrew H. Sherman** of the law firm Sills Cummins & Gross, P.C., be admitted to practice before this Court *pro hac vice* and that he be enrolled as proposed co-counsel of record for them.

DATED: June 29, 2016

Respectfully submitted by:

/s/ J. Eric Lockridge
J. Eric Lockridge (Bar Roll #30159)
eric.lockridge@keanmiller.com
Kean Miller LLP
II City Plaza
400 Convention Street, Suite 700 (70802)
P. O. Box 3513
Baton Rouge, LA 70821-3513
Telephone: 225.389.3756
Facsimile: 225.388.9133
***Proposed Co-Counsel for the Official
Committee of Unsecured Creditors***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing *Ex Parte* Motion to Appear Pro Hac Vice was served upon all required parties via the court’s CM/ECF System, including Debtor’s counsel, the U.S. Trustee and all parties requesting special notice, on this day, June 29, 2016.

/s/ J. Eric Lockridge

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
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Case No. 16-50740

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Jointly Administered:

OATH OF APPLICANT

Pursuant to 28 U.S.C. § 1746, Boris I. Mankovetskiy declares as follows:

1. My name is Boris I. Mankovetskiy.
2. My contact information is as follows: Sills Cummins & Gross, P.C., One Riverfront Plaza, Newark, NJ, 07102, my telephone number is 973.643.7000, and my email address is bmankovetskiy@sillscummis.com.
3. I am a member in good standing of the United States District Court District of New Jersey, the Southern District of New York and the State Bars of New Jersey and New York and Washington, D.C..
4. To the best of my knowledge, no disciplinary proceedings or criminal charges have been instituted against me.
5. I do solemnly swear that I will support the Constitution of the United States and that I will demean myself uprightly and according to the law and the recognized standards of ethics of the legal profession. I do further solemnly swear that I have read the

Federal Rules of Civil Procedure; the Local Rules of the United States District Court for the Western District of Louisiana, including Local Rule 83.2.6; and the Local Rules of the United States Bankruptcy Court for the Western District of Louisiana; and I am fully prepared to use and abide by them in my practice before this Court.

6. If granted permission to appear before this Court and to represent the Official Committee of Unsecured Creditors ("the Committee"), I will work in conjunction with proposed co-counsel for the Committee, J. Eric Lockridge.

7. For these reasons, I, Boris I. Mankovetskiy, ask the Court to grant this application to appear *pro hac vice* and allow me to appear before this Court until the conclusion of these cases.

8. I have reviewed this Declaration and hereby declare under penalty of perjury that the foregoing is true and correct and within my personal knowledge.

Executed this 27nd day of June, 2016.



Boris I. Mankovetskiy

EXHIBIT B

United States District Court
Southern District of New York

**Certificate of
Good Standing**

I, Ruby J. Krajick, Clerk of this Court, certify that

BORIS I. MANKOVETSKIY

, Bar #

BM2376

was duly admitted to practice in this Court on

APRIL 01st, 2008, and is in good standing as a member of the Bar of this Court.

500 Pearl Street
Dated at New York, New York

on **JUNE 27th, 2016**

Ruby J. Krajick
Clerk

by


Deputy Clerk