

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-v-

PLATINUM MANAGEMENT (NY) LLC;  
PLATINUM CREDIT MANAGEMENT, L.P.;  
MARK NORDLICHT;  
DAVID LEVY;  
DANIEL SMALL;  
URI LANDESMAN;  
JOSEPH MANN;  
JOSEPH SANFILIPPO; and  
JEFFREY SHULSE,

Defendants.

No. 16-cv-6848 (DLI)(VMS)

NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

-----X

TO: Opposing Counsel  
Neal Jacobson  
US Securities & Exchange Commission  
New York Regional Office  
Brookfield Place, 200 Versey St., Suite 400  
New York, NY 10281-1022

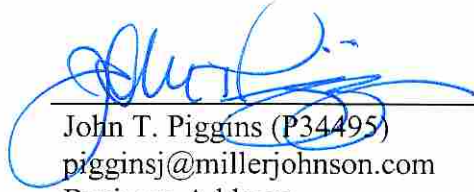
PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto, we will move this Court pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of **Miller Johnson** and a member in good standing of the bar(s) of the State(s) of **Michigan**, as attorney pro hac vice to argue or try this case in whole or in part as counsel for **interested parties Arabella Exploration, LLC and Arabella Operating, LLC, Chapter 11 Debtors in Case no. 17-40120-rfn (Jointly Administered), pending in the United States Bankruptcy**

**Court for the Northern District of Texas.** There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

Dated: \_\_\_\_\_

6/30/17



John T. Piggins (P34495)

pigginsj@millerjohnson.com

Business Address:

45 Ottawa Ave. S.W. Suite 1100

PO Box 306

Grand Rapids, MI 49501-0306

(616) 831-1793

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-v-

PLATINUM MANAGEMENT (NY) LLC;  
PLATINUM CREDIT MANAGEMENT, L.P.;  
MARK NORDLICHT;  
DAVID LEVY;  
DANIEL SMALL;  
URI LANDESMAN;  
JOSEPH MANN;  
JOSEPH SANFILIPPO; and  
JEFFREY SHULSE,

Defendants.

No. 16-cv-6848 (DLI)(VMS)

AFFIDAVIT OF JOHN T.  
PIGGINS IN SUPPORT OF  
MOTION TO ADMIT  
COUNSEL *PRO HAC VICE*

-----X

STATE OF MICHIGAN }  
COUNTY OF KENT }ss.

**John T. Piggins**, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm of Miller Johnson.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above captioned matter.
3. As shown in the Certificate(s) of Good Standing annexed hereto I am a member in good standing of the Bar of the State(s) of **Michigan**.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.
5. I [circle one] have or have not been convicted of a felony. [If you circled "have," please describe facts and circumstances.] \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

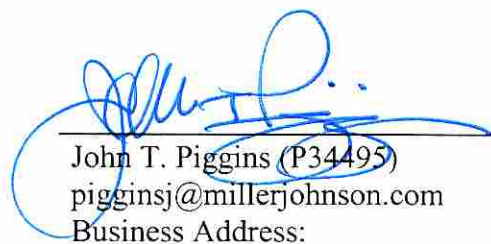
6. I [circle one] have or have not been censured, suspended, disbarred or denied admission or readmission by any court. [If you circled "have," please describe facts and circumstances.] \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate *pro hac vice* in this one case for **interested parties Arabella Exploration, LLC and Arabella Operating, LLC.**

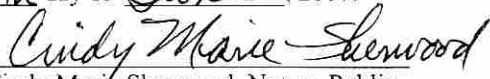
Dated: \_\_\_\_\_

6/30/17



John T. Piggins (P34495)  
pigginsj@millerjohnson.com  
Business Address:  
45 Ottawa Ave. S.W. Suite 1100  
PO Box 306  
Grand Rapids, MI 49501-0306  
(616) 831-1793

Subscribed and sworn to before me this  
30th day of June, 2017.



Cindy Marie Sherwood, Notary Public  
Commissioned in Kent County, Michigan  
Acting Kent County, Michigan  
My commission expires: 1/9/2020

CINDY MARIE SHERWOOD  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF KENT  
MY COMMISSION EXPIRES Jan 9, 2020  
ACTING IN COUNTY OF *KENT*

# State Bar of Michigan

## Certificate of Good Standing

This certifies that John T. Piggins, P34495 of Grand Rapids, Michigan is an active member of the State Bar of Michigan in good standing.

He/She was admitted to practice in Michigan on November 23, 1982 in Kent County and became a member of the State Bar of Michigan on November 23, 1982.



A handwritten signature in black ink, appearing to read "Janet K. Welch", is written over a horizontal line.

Janet K. Welch, Executive Director  
June 30, 2017