

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PLATINUM-BEECHWOOD LITIGATION

Civil Action No.
1:18-cv-6658

MELANIE L. CYGANOWSKI, AS RECEIVER,
BY AND FOR PLATINUM PARTNERS CREDIT
OPPORTUNITIES MASTER FUND LP,
PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (TE) LLC, PLATINUM
PARTNERS CREDIT OPPORTUNITIES FUND
LLC, PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND INTERNATIONAL
LTD., PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND INTERNATIONAL (A)
LTD., and PLATINUM PARTNERS CREDIT
OPPORTUNITIES FUND (BL) LLC,

Civil Action No.
1:18-cv-12018

**MOTION FOR ADMISSION
*PRO HAC VICE***

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Michael J. Merrick, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for PB Investment Holdings Ltd., as Defendant/Third-Party Defendant, in the above-captioned action.

I am in good standing of the Bar of the State of Texas and there are no pending disciplinary proceedings against me in any state or federal court.

Dated: November 6, 2019

Respectfully submitted,

Condon Tobin Sladek Thornton, PLLC

/s/ Michael J. Merrick

Michael J. Merrick
Texas Bar No. 24041474
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Dallas, Texas 75231
(214) 265-3851 Telephone
(214) 691-6311 Facsimile

Counsel for PB Investment Holdings Ltd.

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OPPORTUNITIES FUND (BL) LLC,

Civil Action No.
1:18-cv-12018

**AFFIDAVIT OF MICHAEL J.
MERRICK IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE**

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

STATE OF TEXAS §
 §
COUNTY OF DALLAS §

BEFORE ME, the undersigned authority, on this day personally appeared Michael J. Merrick, who being by me duly sworn upon his oath deposed and stated as follows:

1. “My name is Michael J. Merrick. I am an attorney licensed to practice law in the State of Texas. I am over the age of eighteen (18) years and have never been convicted of a felony or crime involving moral turpitude. I have personal knowledge of the facts contained in this affidavit and they are within my knowledge and true and correct.

2. “I have never been censured, disbarred or denied admission or readmission by any court.

3. "There are no disciplinary proceedings presently against me."

Further Affiant sayeth not.

Signed NOVEMBER 6, 2019.



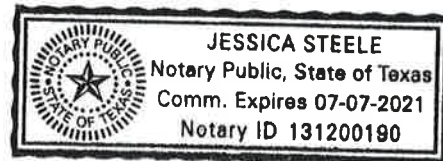
Michael J. Merrick

SWORN AND SUBSCRIBED TO BEFORE ME, on November 6, 2019.



Notary Public in and for the State of Texas

My commission expires 7/7/21.



The Supreme Court of Texas

AUSTIN

CLERK'S OFFICE

I, **BLAKE HAWTHORNE**, Clerk of the Supreme Court of Texas, certify that the records of this office show that

Michael Jason Merrick

was duly admitted and licensed as an attorney and counselor at law by the Supreme Court of Texas on the 6th day of November, 2003.

I further certify that the records of this office show that, as of this date

Michael Jason Merrick

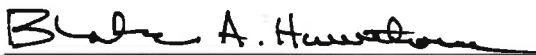
is presently enrolled with the State Bar of Texas as an active member in good standing.

IN TESTIMONY WHEREOF witness my signature



and the seal of the Supreme Court of Texas at the City of Austin, this, the 23th day of October, 2019.

BLAKE HAWTHORNE, Clerk


Clerk, Supreme Court of Texas

No. 3248C.1

STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

October 23, 2019

Re: Mr. Michael Jason Merrick, State Bar Number 24041474

To Whom It May Concern:

This is to certify that Mr. Michael Jason Merrick was licensed to practice law in Texas on November 06, 2003, 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; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

A handwritten signature in black ink, appearing to read "Seana Willing", with a stylized flourish at the end.

Seana Willing
Chief Disciplinary Counsel
SW/web



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Civil Action No.
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**ORDER FOR ADMISSION
*PRO HAC VICE***

Plaintiffs,

v.

BEECHWOOD RE LTD., *et al.*,

Defendants.

The Motion of MICHAEL J. MERRICK, for admission to practice *Pro Hac Vice* in the above-captioned action, is granted.

Applicant has declared that he is a member in good standing of the Bar of the State of Texas, and that his contact information is as follows:

Applicant's Name:	Michael J. Merrick
Firm Name:	Condon Tobin Sladek Thornton, PLLC
Address:	8080 Park Lane, Suite 700
City/State/Zip:	Dallas, Texas 75221
Telephone/Fax:	(214) 265-3851 Telephone (214) 691-6311 Facsimile

Email: mmerrick@ctstlaw.com.

Applicant having requested admission *Pro Hac Vice* to appear for all purposes as counsel for Defendant/Third-Party Defendant, PB Investment Holdings Ltd., in the above entitled action.

IT IS HEREBY ORDERED that Applicant is admitted to practice *Pro Hac Vice* in the above-captioned case pending 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.

Dated: _____

United States District / Magistrate Judge