

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR
9004-2(c)**

REED SMITH LLP

Formed in the State of Delaware
Richard P. Norton, Esq. (RN-2231)
136 Main Street, Suite 250
Princeton, New Jersey 08543

In re:

NATHAN AND MIRIAM BARNERT
MEMORIAL HOSPITAL ASSOCIATION,
d/b/a BARNERT HOSPITAL,

Debtor.

Chapter 11

Case Nos. 07-21631-DHS

Honorable Donald H. Steckroth

**APPLICATION TO APPEAR PRO HAC VICE PURSUANT TO
LOCAL BANKRUPTCY RULE 2090-1 AND D.N.J.L. CIV. R. 101.1**

Richard P. Norton (the “Movant”), a member in good standing of the Bar of the State of New Jersey and an attorney admitted to practice before the United States Bankruptcy Court for the District of New Jersey, and an associate in the law firm of Reed Smith LLP, hereby moves the Court to enter an order permitting Eric A. Schaffer (the “Admittee”), to practice pro hac vice before the United States Bankruptcy Court for the District of New Jersey and to represent The Bank of New York, as indenture trustee (“Bank of New York”), in this chapter 11 case, pursuant to Local Bankruptcy Rule 2090-1 of the United States Bankruptcy Court for the District of New Jersey. In support of this Application, the Movant states as follows:

1. Eric A. Schaffer is a member in good standing of the Bars of the State of New York and the Commonwealth of Pennsylvania and is admitted to practice before the United States District Court for the Western District of Pennsylvania, and is not currently under suspension or subject to other disciplinary action with respect to his practice.

2. Attached as Exhibit A is the Affirmation of the Admittee.
3. Movant requests that this Court allow this Motion so that the Admittee can file pleadings and appear and be heard at any hearings in this chapter 11 proceeding.
4. No previous motion has been made for the relief sought herein.
5. Notice of this Application has been given to all parties entering an appearance in this chapter 11 proceeding. In light of the nature of the relief request, the movant submits that no further notice is required.

WAIVER OF MEMORANDUM OF LAW

6. Pursuant to D.N.J. LBR 9013-2, Movant respectfully requests that the Court waive the requirement that Movant, on behalf of Bank of New York, file a memorandum of law in support of this Motion. No memorandum of law is necessary because no novel issues of law are presented herein.

WHEREFORE, Movant, on behalf of Bank of New York, requests entry of the attached order and such other and further relief as is just.

Respectfully submitted this 20th day of August, 2007.

REED SMITH LLP

/s/Richard P. Norton
Richard P Norton
136 Main Street, Suite 250
Princeton, New Jersey 08543
Tel: 609 987 0050
Fax: 609 951 0824
rnorton@reedsmith.com

Counsel for The Bank of New York, as
Indenture Trustee

EXHIBIT A

AFFIRMATION OF ERIC A. SCHAFFER

I affirm that I am eligible for admission to this Court, am admitted to practice in the jurisdictions specified in the Application, and am in good standing in such jurisdictions. I submit to the disciplinary jurisdiction of this Court for any alleged misconduct that occurs in the Court pursuant to Local Rule 101.1(c) of the United States District Court for the District of New Jersey, and I have access to or have acquired a copy of the Local Rules of this Court and am familiar with such Rules.

Dated: August 20, 2007

/s/Eric A. Schaffer
Eric A. Schaffer

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CERTIFICATE OF SERVICE

I hereby certify, under penalty of perjury, that a true and correct copy of the Application to Appear Pro Hac Vice Pursuant to Local Bankruptcy Rule 2090-1 and D.N.J.L. CIV. R. 101.1 was caused to be served on the parties on the attached Service List in the manner listed, on the 20th day of August, 2007.

Dated: August 20, 2007

/s/Stacy L. Lucas
Stacy L. Lucas,
136 Main Street, Suite 250
Princeton, New Jersey 08543
Tel: 609/987.0500
Fax: 609/951.0824

SERVICE LIST

<p>David J. Adler, Esq. McCarter & English, LLP Four Gateway Center 100 Mulberry Street Newark, NJ 07102 Tel: (973) 622-4444 Fax: (973) 624-7070 Email: DAdler@McCarter.com</p> <p>Counsel for Debtor</p> <p><i>VIA ELECTRONIC MAIL</i></p>	<p>Donald MacMaster Office of The United States Trustee One Newark Center, Suite 2100 Newark, NJ 07102 Donald.F.MacMaster@usdoj.gov</p> <p><i>VIA ELECTRONIC MAIL</i></p>
<p>Nathan and Miriam Barnert Memorial Hospital Association 680 Broadway Paterson, NJ 07514</p> <p><i>VIA FIRST CLASS MAIL</i></p>	

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ORDER ADMITTING ERIC A. SCHAFFER PRO HAC VICE

The relief set forth on the following pages is hereby **ORDERED**.

This matter having been brought before the Court on application for an Order for Admission *Pro Hac Vice*; and the Court having reviewed the moving papers of the application, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ. Pro. 78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 2090-1, and good cause having been show; it is

ORDERED that Eric A. Schaffer be permitted to appear *pro hac vice*; provided that pursuant to D.N.J. L.Civ.R.101.1(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney of law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L.Civ.R. 101.1, said fee to be deposited within twenty (20) days of the date of entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L.Civ.R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States Bankruptcy Court for the District of New Jersey at the following address, for forwarding by the Clerk to the District Court:

United States Bankruptcy Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United

States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

CERTIFICATE OF MAILING

I HEREBY CERTIFY that I served a copy of this Order on the applicant and the Treasurer of the New Jersey Lawyers' Fund for Client Protection, Richard J. Hughes Justice Complex, P.O. Box 961, Trenton, NJ 08625-0961 on _____, 2007.

JAMES J. WALDRON, Clerk