

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)
DN-5391
JR-5861

WINSTON & STRAWN LLP
The Legal Center
One Riverfront Plaza, 7th Floor
Newark, New Jersey 07102
(973) 621-2230
James Richter

WINSTON & STRAWN LLP
200 Park Avenue
New York, New York 10166
(212) 294-6700
David Neier

Attorneys for MBIA Insurance Corporation.

In re:

NATHAN AND MIRIAM BARNERT
MEMORIAL HOSPITAL ASSOCIATION,

Debtors-in-Possession.

Case Nos. 07-21631-DHS

Judge: Donald H. Steckroth

Hearing Date: n/a

**APPLICATION TO ADMIT DAVID
NEIER *PRO HAC VICE***

TO: PARTIES ON ATTACHED SERVICE LIST

SIR/MADAM:


PLEASE TAKE NOTICE that, pursuant to Rule 2090-1 of the District of New Jersey Local Bankruptcy Rules, Winston & Strawn LLP, attorneys for MBIA Insurance Corporation., hereby makes application before the United States Bankruptcy Court, the District of New Jersey,

50 Walnut Street, Newark, New Jersey, for the entry of an order admitting David Neier *pro hac vice* in the above-captioned matter to represent MBIA Insurance Corporation.

The undersigned shall rely upon the Certifications of James S. Richter, Esq. and David Neier, Esq. in support of said application.

The undersigned hereby requests that, in accordance with D.N.J. LBR 2090-1, if no objection to the within application is filed within five (5) days, the application be granted and the proposed form of Order be entered.

WINSTON & STRAWN LLP
Attorneys for MBIA Insurance Corporation.

By 
James S. Richter
jrichter@winston.com

Dated: September 18, 2007

OF COUNSEL:

David Neier
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of September, 2007, I caused to be served the foregoing Application, together with supporting Certifications and a proposed Order upon all counsel by ECF.


James S. Richter

Dated: September 18, 2007

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Attorneys for MBIA Insurance Corporation

In re:

NATHAN AND MIRIAM BARNERT
MEMORIAL HOSPITAL ASSOCIATION,

Debtors-in-Possession.

Case Nos. 07-21631-DHS

Judge: Donald H. Steckroth

Hearing Date: n/a

**CERTIFICATION OF DAVID NEIER IN
SUPPORT OF *PRO HAC VICE*
APPLICATION**

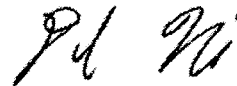
DAVID NEIER, hereby certifies as follows:

1. I am a member of Winston & Strawn LLP and an attorney at law admitted to practice in the State of New York, the United States District Court for the Southern District of New York and the United States District Court for the Eastern District of New York.

2. I am in good standing in all bars where I am admitted to practice and am not under suspension or disbarment by any Court.

3. I make this certification in connection with my application to be admitted *pro hac vice* in the above-captioned matter to represent MBIA Insurance Corporation. If my application is granted, I agree to abide by the local rules of the United States Bankruptcy Court for the District of New Jersey requiring payment to the New Jersey Lawyer's Fund for Client Protection as provided in Local District Court Rule 101.1(2) and to the United States District Court pursuant to Local District Court Rule 101(c)(3).

I certify under penalty of perjury that the foregoing is true and correct.



David Neier

Dated: September 4, 2007

UNITED STATES BANKRUPTCY COURT
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David Neier (DN-5391)

Attorneys for MBIA Insurance Corporation

In re:

NATHAN AND MIRIAM BARNERT
MEMORIAL HOSPITAL ASSOCIATION,

Debtors-in-Possession.

Case Nos. 07-21631-DHS

Judge: Donald H. Steckroth

Hearing Date: n/a

**CERTIFICATION OF JAMES S.
RICHTER IN SUPPORT OF
APPLICATION TO ADMIT DAVID
NEIER *PRO HAC VICE***

James S. Richter, hereby certifies as follows:

1. I am an attorney at law of the State of New Jersey and a member of Winston & Strawn LLP, attorneys for MBIA Insurance Corporation. As such, I have personal knowledge of the facts set forth herein.

2. This certification is submitted in support of the application to have David Neier admitted *pro hac vice* in this matter.

3. I am a member in good standing of the bar of the State of New Jersey and the bar of the United States District Court and Bankruptcy Court for the District of New Jersey and am not under suspension or disbarment by any Court.

4. I understand further that only I, or another lawyer in my firm who is also a member in good standing of the State of New Jersey and the bar of the United States Bankruptcy Court for the District of New Jersey, may file papers, enter appearances for parties, sign stipulations or sign and receive payments on judgments, decrees or orders.

I certify under penalty of perjury that the foregoing is true and correct.


James S. Richter

Dated: September 18, 2007

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

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

In Re:

Case No.: _____

Judge: _____

Chapter: _____

Recommended Local Form: Followed Modified

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page 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 applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 2090-1, and good cause having been shown; it is

ORDERED that _____ 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 at 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 DNJ L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the 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 entry 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, N.J. 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 _____, 20____.

JAMES J. WALDRON, Clerk

PRO HAC VICE ADMISSION IN NEW JERSEY
INFORMATION TO BE SUBMITTED WITH PAYMENT

Rules 1:21-2(a), 1:20-1(b), 1:28-2, 1:28B-1(e)

Please submit one check for each attorney payable to NJ Lawyers' Fund for Client Protection
Mail to NJ Lawyers' Fund, P.O. Box 961, Trenton, NJ 08625-0961

2007 ASSESSMENT \$186.00

The fee is assessed **once per calendar year** per attorney. Attorneys admitted for additional cases within the calendar year should submit the appropriate paperwork; however, **no additional payment** is required. If a case continues into the next year, a fee for **that year** will be assessed. An attorney's appearance continues until either the matter is concluded or there is a substitution of counsel.

Pro Hac Vice Attorney:

NAME: LAST _____ FIRST _____ MIDDLE _____ TITLE _____

DATE OF BIRTH _____ MALE FEMALE

JURISDICTION WHERE FIRST ADMITTED TO ANY U.S. BAR _____ YEAR ADMITTED _____

Firm Name _____ Telephone # _____

Address _____

Address _____

City _____ State _____ Zip _____ - _____

e-mail _____

Sponsoring New Jersey Attorney:

NAME: LAST _____ FIRST _____ MIDDLE _____ TITLE _____

Firm Name _____ Telephone # _____

Address _____

Address _____

City _____ State _____ Zip _____ - _____

Enclose a copy of the signed Court Order. If it is not yet available, provide an unsigned copy or the following information; send a signed copy when it becomes available.

Docket # _____ Jurisdiction _____

Judge's Name _____

Questions? Please contact the NJ Lawyers' Fund's *Pro Hac Vice* Unit at (609) 292-8009.