

**MORITT HOCK HAMROFF & HOROWITZ LLP**

400 Garden City Plaza  
Garden City, New York 11530  
(516) 873-2000

Attorneys for General Electric Capital Corporation  
Leslie A. Berkoff (4584)  
Lee J. Mendelson (3374)

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY (NEWARK)**

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**In re:**

**NATHAN & MIRIAM BARNERT  
MEMORIAL HOSPITAL ASSOCIATION  
d/b/a BARNERT HOSPITAL**

**Chapter 11  
Case No. 07-21631-DHS**

**Hon. Donald H. Steckroth**

**Debtor.**

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

TO THE HONORABLE DONALD H. STECKROTH:

Lee J. Mendelson (the "Movant"), a member in good standing of the Bar of the State of New Jersey and who is of Counsel for the law firm of Moritt Hock Hamroff & Horowitz LLP, hereby moves the Court to enter an order permitting Leslie A. Berkoff, a partner with the law firm of Moritt Hock Hamroff & Horowitz LLP (the "Admittee"), to practice *pro hac vice* before the United States Bankruptcy Court for the District of New Jersey and to represent General Electric Capital Corporation ("GECC") in this chapter 11 case, pursuant to Local Bankruptcy Rule 2090-1 of the United States District Court for the District of New Jersey. In support of this Application, the Movant states as follows:

1. Leslie A. Berkoff is a member in good standing of the Bars of the States of New York and Connecticut and is admitted to practice before the United States District Courts for the Eastern, Southern, Northern and Western Districts of New York and the District Court of

Connecticut, and is not currently under suspension or subject to other disciplinary action with respect to her practice.

2. Attached as *Exhibit A* is the Certification 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. In light of the nature of the relief requested, the movant submits that no further notice is required.

**WAIVER OF MEMORANDUM OF LAW**

6. Pursuant to D.N.J. LBR 9013-2, GECC respectfully requests that the Court waive the requirement that GECC 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, GECC requests entry of the attached order and such other and further relief as is just.

Dated: September 21, 2007  
Garden City, New York

Respectfully submitted,

MORITT HOCK HAMROFF & HOROWITZ LLP  
Attorneys for General Electric Capital Corporation

By: /s/ Lee J. Mendelson

Lee J. Mendelson  
Moritt Hock Hamroff & Horowitz LLP  
400 Garden City Plaza  
Garden City, NY 11530  
516.873.2000 (Telephone)

# Exhibit A

**AFFIRMATION OF LESLIE A. BERKOFF**

I affirm that 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 am access to or have acquired a copy of the Local Rules of this Court and am familiar with such Rules.

Dated: September 21, 2007

/s/ Leslie A. Berkoff  
Leslie A. Berkoff

**MORITT HOCK HAMROFF & HOROWITZ LLP**

Attorneys for General Electric Capital Corporation

400 Garden City Plaza

Garden City, New York 11530

(516) 873-2000

Leslie A. Berkoff (LB-4584)

Lee J. Mendelson (LM-3374)

**UNITED STATES BANKRUPTCY COURT  
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Chapter 11

**NATHAN & MIRIAM BARNERT MEMORIAL  
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Debtor.

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**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 application, 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 Leslie A. Berkoff 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 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 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