

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

In re:)	
)	Chapter 11
CAFÉ HOLDINGS CORP., <i>et al.</i> , ¹)	Case No. 18-05837 (hb)
)	
Debtors.)	Jointly Administered
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Motion in Support of *Pro Hac Vice* Application

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that **Steven W. Golden** be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02):
 - Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: will likely oppose; does not intend to oppose
 - Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Cafe Holdings Corp. (7910); Cafe Enterprises, Inc. (4946); CE Sportz LLC (2009); and CES Gastonia LLC (0863). The location of the Debtors’ corporate headquarters is 4324 Wade Hampton Blvd., Suite B, Taylors, South Carolina 29687.

No duty of consultation is required because the opposing party is proceeding pro se.

/s/ B. Keith Poston

B. Keith Poston

Federal Bar No. 10599

Nelson Mullins Riley & Scarborough LLP

1320 Main Street / 17th Floor

Post Office Box 11070 (29211-1070)

Columbia, SC 29201

(803) 799-2000

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Local Counsel for the Official Committee of Unsecured Creditors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

In re: Chapter 11
CAFÉ HOLDINGS CORP., *et al.*,¹ Case No.: 18-05837 (hb)
Debtors. (Jointly Administered)
Application/Affidavit for *Pro Hac Vice*
Admission

(1) Name. Steven W. Golden
First Middle Last

(2) Residence. I reside in the following state: New York
If a South Carolina resident, indicate months/years of residence: _____

(3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Pachulski Stang Ziehl & Jones LLP
780 Third Avenue, 34th Floor
New York, New York 10017
Telephone: (212) 561-7700
Facsimile: (212) 561-7777
Email: sgolden@pszjlaw.com

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.²

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of New York where I regularly practice law. **Attached is my certificate of good standing.**

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² This District I maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing
U.S. District Court, SD New York	07/19/2016	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. District Court, ND New York	03/07/2017	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. District Court, Maryland	02/13/2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. District Court, ND Texas	07/31/2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. District Court, SD Texas	08/13/2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. District Court, WD Texas	08/18/2015	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

(7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures? Yes No
 (If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

(8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?
 Yes No
 (If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

(9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?
 Yes No
 (If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?
 Yes No
 (If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

- (11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?

Yes No

(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Keith Poston
Nelson Mullins Riley & Scarborough LLP
1320 Main St., 17th Fl.
Columbia, SC 29201
Telephone: (803) 799-2000
Facsimile: (803) 256-7500
Email: keith.poston@nelsonmullins.com

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

Frank B.B. Knowlton and Shane G. Ramsey

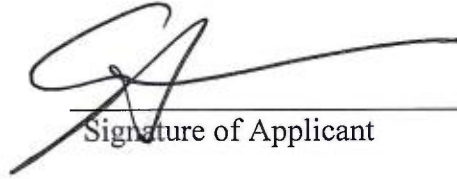
- (14) Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:

The Official Committee of Unsecured Creditors

(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.



Signature of Applicant

Sworn to and subscribed before me
this 07th day of December, 2018.

Rhea S Cheltenham
A Notary Public
of the State of New York

My Commission expires: July 31, 2021

RHEA S CHELTENHAM
Notary Public, State of New York
No. 01CH6362269
Qualified in Kings County
My Commission Expires July 31, 2021

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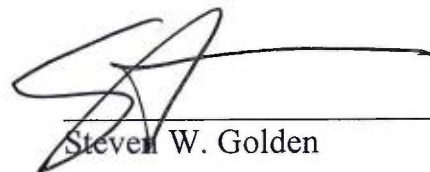
Supplemental Application for *Pro Hac Vice* Admission

The undersigned has filed an Application for *Pro Hac Vice* Admission. The undersigned further certifies that:

1. Steven W. Golden has a proficient understanding of bankruptcy law and procedure to wit (set forth a brief summary of the applicant’s understanding of bankruptcy law and procedure):

Steven W. Golden has experience representing debtors, secured creditors, unsecured creditors, and committees in corporate bankruptcy proceedings.

2. Steven W. Golden agrees to abide by the District of South Carolina Local Bankruptcy Rules and applicable chambers guidelines.



Steven W. Golden

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United States District Court
Southern District of New York

Certificate of Good Standing

I, *Ruby J. Krajick*, Clerk of Court, Certify that

STEVEN WILLIAM GOLDEN, Bar # SG6922

was duly admitted to practice in the Court on


July 19, 2016

and is in good standing as a member of the Bar of this Court

Dated at
500 Pearl St.
New York, New York

On December 6, 2018

Ruby J. Krajick
Clerk of Court

By 
Deputy Clerk

