

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

OPEN ROAD FILMS, LLC, a Delaware
limited liability company, *et al.*,

Debtors.

Chapter 11

Case No.: 18-12012 (LSS)

(Jointly Administered)

**RICHARD DUTCHER'S MOTION FOR LEAVE TO APPEAR
PRO HAC VICE WITHOUT ASSOCIATION WITH LOCAL COUNSEL**

Richard Dutcher requests leave of the court to appear *pro hac vice* without association with local counsel. Local Rule 9010-1(e)(iii) permits counsel appearing to “file or prosecute a proof of claim or response to their claim” can appear *pro hac vice* without association with Delaware counsel. Local Rule 9010-1(c) permits the Court to allow admission of a party without association of counsel in its discretion.

Mr. Dutcher has a good faith belief that he and Open Road may still reach a stipulation for the lifting of the automatic stay, or if no agreement is reached, that the matter is akin to the litigation of a claim per Local Rule 9010-1(c) and under these circumstances, local association is not necessary. The underlying issue is straightforward. As set forth in the accompanying Motion for Relief from the Automatic Stay, Mr. Dutcher is a plaintiff in a case set for trial on December 3, in which Open Road is a defendant who is covered by liability insurance. There should not be any significant litigation. Mr. Dutcher agrees to proceed against Open Road's liability policy and not to pursue any excess liability from the bankruptcy estate.

Accordingly, Mr. Dutcher respectfully requests that counsel be permitted to appear *pro hac vice* without association with local counsel.

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