

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re:

Case No.: 18-12741-BKC-LMI

MIAMI INTERNATIONAL MEDICAL CENTER,
LLC d/b/a THE MIAMI MEDICAL CENTER,

Chapter 11

Debtor.

MOTION TO APPEAR PRO HAC VICE

I, Leyza F. Blanco (“Movant”), a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court, request that this court admit pro hac vice Jeffrey C. Wisler (“Visiting Attorney”), an attorney admitted to practice and currently in good standing in the United States District Courts for the Districts of Delaware and New Jersey, qualified to practice in this court, who proposes to act as counsel for Cigna HealthCare of Florida, Inc. and Healthspring of Florida, Inc. (“Clients”) in the case listed above, and in any adversary proceedings therein in which the Visiting Attorney appears on behalf of such Clients.

I am aware that the local rules of this court require a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court to act as local counsel for such Clients, unless the court specifically authorizes an attorney not so admitted to act as local counsel. I understand that local counsel is required to participate in the preparation and presentation of, and accept service of all papers in, the case identified above and any adversary proceedings in which the Visiting Attorney appears on behalf of such Clients.

I am a member in good standing of the bar of the United States District Court for the Southern District of Florida and qualified to practice in this court, and agree to act as local counsel

for the above-referenced Clients in this case and in any adversary proceedings in this case in which the Visiting Attorney appears on behalf of the Clients. I understand that I am required to participate in the preparation and the presentation of the case above and any such adversary proceedings and to accept service of all papers served in such case and proceedings.

The order granting this Motion will serve to admit the Visiting Attorney to practice in the case noted above on behalf of the Clients and in any adversary proceedings in that case in which the Visiting Attorney appears on behalf of such Clients. I understand that if I decline to serve as local counsel in any such adversary proceeding, separate local counsel must file an additional Motion to Appear Pro Hac Vice, and that absent such separate motion and an order of this court approving the same I will continue to act as local counsel for the Clients in all such proceedings.

The affidavit of the Visiting Attorney required under Local Rule 2090-1(C)(2) is filed concurrently herewith.

WHEREFORE, upon the foregoing representations, Movant respectfully requests an order of this court authorizing the Visiting Attorney to appear pro hac vice in this case and in any adversary proceedings in this case on behalf of the Clients and indicating Movant as local counsel for the Clients, and for such other and further relief as may be just.

Date: June 21, 2018

Respectfully submitted,
SEQUOR LAW
1001 Brickell Bay Drive, 9th Floor
Miami, FL 33131
Telephone: (305) 372-8282
Facsimile: (305) 372-8202
Email: lblanco@sequorlaw.com

By: /s/ Leyza F. Blanco
Leyza F. Blanco
Florida Bar No.: 104639

AFFIDAVIT OF PROPOSED VISITING ATTORNEY

I, Jeffrey C. Wisler, am a member in good standing of the bar of the States of Delaware and New Jersey. I am a member in good standing of the bar of the United States District Court for the Districts of Delaware and New Jersey, but am not admitted to the bar of the United States District Court for the Southern District of Florida. I certify that I have never been disbarred, that I am not currently suspended from the practice of law in the State of Florida or any other state, and that I am not currently suspended from the practice of law before any United States Court of Appeals, United States District Court, or United States Bankruptcy Court.

I hereby request authority to appear pro hac vice in this case and in any adversary proceedings in this case on behalf of Cigna HealthCare of Florida, Inc. and Healthspring of Florida, Inc. ("Clients"). I designate, Leyza F. Blanco ("Local Counsel"), who is qualified to practice in this court, as local counsel for the Clients. I understand that Local Counsel is required to participate in the preparation and the presentation of the case above and any adversary proceedings in which I appear on behalf of such Clients, and accept service of all papers served in such case and proceedings, unless and until other local counsel is designated and accepts such designation by filing a separate Motion to Appear Pro Hac Vice on my behalf.

I certify that I am familiar with and shall and shall be governed by the local rules of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of the Florida Bar.

Date: June 21, 2018

CONNOLLY GALLAGHER LLP

1000 West Street, Suite 1400

Wilmington, DE 19801

Telephone: (302) 757-7300

Facsimile: (302) 658-0380

Email: jwisler@connollygallagher.com

By: _____


Jeffrey C. Wisler

Delaware Bar No.: 2795

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re:

Case No.: 18-12741-BKC-LMI

MIAMI INTERNATIONAL MEDICAL CENTER,
LLC d/b/a THE MIAMI MEDICAL CENTER,

Chapter 11

Debtor.

ORDER ADMITTING ATTORNEY PRO HAC VICE

This matter came before the court without a hearing on the Motion to Appear Pro Hac Vice [ECF No.]. The court having reviewed the motion and good cause appearing, it is

ORDERED that Jeffrey C. Wisler (“Visiting Attorney”) may appear before this court pro hac vice as counsel for Cigna HealthCare of Florida, Inc. and Healthspring of Florida, Inc. (“Clients”) in this case and in each adversary proceeding in this case where Visiting Attorney appears on behalf of Clients, subject to the local rules of this court. Visiting Attorney shall include the certification required by Local Rule 9011-4(B)(2) in all papers filed with this court.

Visiting Attorney may apply to become a registered user of CM/ECF in this district with full filing privileges in this case and in any other case in which this court has entered an order admitting Visiting Attorney pro hac vice.

The following attorney ("Local Attorney") is designated as the attorney qualified to practice in this court with whom the court and other counsel may readily communicate and upon whom papers may be served:

Leyza F. Blanco, Esq.
Florida Bar No. 104639
SEQUOR LAW
1001 Brickell Bay Drive, 9th Floor
Miami, FL 33131
Email: lblanco@sequorlaw.com
Telephone: (305) 372-8282
Facsimile: (305) 372-8202

Local Attorney shall act as the local attorney as required by Local Rule 2090-1(C)(2) in this case and in each adversary proceeding in this case in which the Visiting Attorney appears on behalf of the Clients. If Local Attorney declines to serve as the local attorney in any such adversary proceeding, a separate local attorney must file an additional Motion to Appear Pro Hac Vice, and absent such separate motion and an order of this court approving the same Local Attorney will continue to act as local attorney for the Clients in all such proceedings.

###

Submitted by:
Leyza F. Blanco, Esq.

Copies furnished to:
Leyza F. Blanco, Esq.
Florida Bar No. 104639
SEQUOR LAW
1001 Brickell Bay Drive, 9th Floor
Miami, FL 33131
Email: lblanco@sequorlaw.com

Telephone: (305) 372-8282
Facsimile: (305) 372-8202

(Attorney Blanco shall serve a conformed copy of the foregoing upon all interested parties and file a Certificate of Service with this Court)