

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

RMS TITANIC, INC., *et al.*,¹

Debtors.

Case No. 3:16-bk-02230-PMG
Chapter 11 (Jointly Administered)

RMS TITANIC, INC.,

Plaintiff,

Adv. Pro. No. 3:16-ap-00183-PMG

vs.

FRENCH REPUBLIC
a/k/a REPUBLIC OF FRANCE,

Defendant.

**PLAINTIFF'S EX-PARTE MOTION FOR ADMISSION PRO HAC
VICE OF ATTORNEY BRIAN A. WAINGER AND DESIGNATION
AND CONSENT TO ACT PURSUANT TO LOCAL RULE 2090-1(c)(1)**

Brian A. Wainger, pursuant to Local Rule 2090-1(c)(1), hereby moves for special admission to appear in this case as co-counsel for Plaintiff RMS Titanic, Inc., and states as follows:

1. Movant is an attorney licensed to practice law in the State of Virginia and has been a member in good standing of the Virginia Bar since 1995.

¹ The Debtors in the chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number include: RMS Titanic, Inc. (3162); Premier Exhibitions, Inc. (4922); Premier Exhibitions Management, LLC (3101); Arts and Exhibitions International, LLC (3101); Premier Exhibitions International, LLC (5075); Premier Exhibitions NYC, Inc. (9246); Premier Merchandising, LLC (3867), and Dinosaurs Unearthed Corp. (7309). The Debtors' service address is 3045 Kingston Court, Suite I, Peachtree Corners, Georgia 30071.

2. Movant is also admitted to practice in the United States District Court for the Eastern District of Virginia.

3. Movant designates Daniel F. Blanks who is qualified to practice in this court and who consents to the designation as local counsel.

4. Movant certifies that he has never been disbarred and is not currently suspended from the practice of law in the State of Florida or any other state nor from any United States Bankruptcy Court, District Court, or Court of Appeals.

5. Movant certifies further that he is familiar with 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.

WHEREFORE, Movant respectfully request entry of an order authorizing his special admission to practice in this case.

KALEO LEGAL

By /s/ Brian A. Wainger
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF on February 8, 2017. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Electronic Filing generated by CM/ECF:

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Via U.S. Mail

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