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Attorneys for Ankura Trust Company, LLC

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:

ENVIVA INC., *et al.*,

Debtors.¹

)
) Chapter 11
)

) Case No. 24 – 10453 (BFK)
)

) (Joint Administration Requested)
)

**MOTION FOR ADMISSION TO PRACTICE,
PRO HAC VICE, UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Jason W. Harbour (the “Movant”), hereby moves (this “Motion”) the Court, pursuant to Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia, to enter an order, substantially in the form attached hereto as Exhibit A (the “Order”), authorizing Joel Moss (the “Admittee”) to appear *pro hac vice* in the above captioned cases (collectively, the “Bankruptcy Cases”) and any related proceeding for the purpose of representing Ankura Trust Company, LLC (“Ankura”). In support of this Motion, Movant states:

¹ Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/enviva. The location of the Debtors’ corporate headquarters is: 7272 Wisconsin Avenue, Suite 1800, Bethesda, MD 20814.



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1. The Movant is a member in good standing of the Bar of the Commonwealth of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Mr. Moss is a member in good standing of the Bar of the State of New York and is admitted to practice before the State of California and the United State District Court for the Southern District of New York. There are no disciplinary proceedings pending against him in any jurisdiction in which he is admitted to practice.

3. The Movant requests that this Court authorize the Admittees to file pleadings, to appear and be heard at hearings, and to otherwise participate in the Bankruptcy Cases and all related proceedings.

4. The Movant and his law firm will serve as co-counsel to Ankura with the Admittee and other members of Cahill Gordon & Reindel LLP in the Bankruptcy Cases and all related proceedings.

5. The Admittee's Application is appended to this Motion as Exhibit B and incorporated by reference into this Motion.

6. Notice of this Motion will be provided via CM/ECF electronic notification to all parties registered to receive such notice in the above-captioned cases as of the time of service. Ankura believes that, in view of the facts and circumstances, such notice is sufficient and no other or further notice need be provided.

WHEREFORE, Movant respectfully requests that this Court enter an Order (a) authorizing the Admittees to appear *pro hac vice* in the Bankruptcy Cases and all related proceedings and (b) granting the Movant such other and further relief as is just.

Dated: April 30, 2024
Richmond, Virginia

/s/ Jason W. Harbour

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Attorneys for Ankura Trust Company, LLC

EXHIBIT A

CAHILL GORDON & REINDEL LLP

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:

ENVIVA INC., *et al.*,

Debtors.¹

)
) Chapter 11
)

) Case No. 24 – 10453 (BFK)
)

) (Joint Administration Requested)
)

**ORDER GRANTING MOTION FOR ADMISSION TO PRACTICE,
PRO HAC VICE, UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(3)**

Upon the *Motion for Admission to Practice, Pro Hac Vice, Under Local Bankruptcy Rule 2090-1(E)(3)* (the “Motion”) of Jason W. Harbour with the law firm of Hunton Andrews Kurth LLP, for the admission *pro hac vice* of Joel Moss; the Court finds that (i) it has jurisdiction over the matters raised in the Motion pursuant to 28 U.S.C. §§ 157 and 1334; (ii) this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); (iii) adequate notice of the Motion has been given and that no other or further notice is necessary; and (iv) good and sufficient cause exists for the

¹ Due to the large number of Debtors in these chapter 11 cases, for which joint administration has been requested, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/enviva. The location of the Debtors’ corporate headquarters is: 7272 Wisconsin Avenue, Suite 1800, Bethesda, MD 20814.

granting of the relief requested in the Motion after having given due deliberation upon the Motion and all of the proceedings had before the Court in connection with the Motion.

IT IS HEREBY ORDERED THAT

1. The Motion is GRANTED.
2. Joel Moss is permitted to appear *pro hac vice* as counsel to Ankura in the above-captioned chapter 11 cases and any related proceeding in accordance with Rule 2090-1(E)(3) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia.
3. The Application attached to the Motion as Exhibit B is approved.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: _____, 2024
Richmond, Virginia

UNITED STATES BANKRUPTCY JUDGE

WE ASK FOR THIS:

/s/ Jason W. Harbour

HUNTON ANDREWS KURTH LLP

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LOCAL RULE 9022-1 CERTIFICATE OF SERVICE

Pursuant to Local Bankruptcy Rule 9022-1, I hereby certify that the foregoing proposed order has been either endorsed or served upon all necessary parties.

/s/ Jason W. Harbour

EXHIBIT B

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER
LOCAL BANKRUPTCY RULE 2090-1(E)(3)

In Case No.: 24-10453, * Case Name In re: Enviva Inc., et. al.

PERSONAL STATEMENT

FULL NAME (no initials, please) Joel Moss
Bar Identification Number 4038568 State New York
Firm Name Cahill Gordon & Reindel LLP
Firm Phone # (212) 701-3000 Direct Dial # (212) 701-3668 FAX # (212) 269-5420
E-Mail Address jmoos@cahill.com
Office **Mailing** Address 32 Old Slip; New York, New York 10005
Name(s) of federal court(s) in which I have been admitted SDNY

I am a member in good standing of the Bar of the following United States District Court(s): Southern District of New York.

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

/s/ Joel Moss
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Jason W. Harbour 4/30/2024
(Signature) (Date)

Jason W. Harbour
(Typed or Printed Name)

*Pro hac vice admission in a case shall include an adversary proceeding(s) in the case.