

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 9:24-cv-80722-RLR

DANIEL J. STERMER, as receiver for
NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ, *et. al.*,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

**UNOPPOSED MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission pro hac vice of Mark W. Kinghorn of the law firm of McGuireWoods LLP, Tower Two-Sixty, 260 Forbes Avenue, Suite 1800, Pittsburgh, PA 15222; Tel: 412.667.6000, for purposes of appearance as co-counsel on behalf of Wells Fargo Bank, N.A. in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Mark W. Kinghorn to receive electronic filings in this case, and in support thereof states as follows:

1. Mark W. Kinghorn is not admitted to practice in the Southern District of Florida and is a member in good standing of the following Bar(s) and U.S. District Courts:

- North Carolina (Bar No. 28623)
- USDC, North Carolina, Eastern District
- USDC, North Carolina, Middle District
- USDC, North Carolina, Western District
- U.S. Court of Appeals for the 4th Circuit

2. Movant, Emily Y. Rottmann, Esquire, of the law firm of McGuireWoods LLP, 50 N. Laura Street, Suite 3300, Jacksonville, FL 32202; Tel: 904.798.3200, is a member in good

standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. See Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Mark W. Kinghorn has made payment of this Court's \$200.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Mark W. Kinghorn, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Mark W. Kinghorn at email address: mkinghorn@mcguirewoods.com.

WHEREFORE, Emily Y. Rottmann, moves this Court to enter an Order allowing Mark W. Kinghorn to appear before this Court on behalf of Wells Fargo Bank, N.A., for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Mark W. Kinghorn.

Dated: August 14, 2024

Respectfully submitted,

McGUIREWOODS LLP

/s/ Emily Y. Rottmann

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Attorneys for Defendant Wells Fargo Bank, N.A.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 14, 2024, a true copy of the foregoing was filed with the Court of Court using the CM/ECF system, which will send notice of the electronic filing to all counsel of record.

/s/ Emily Y. Rottmann

Attorney

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 9:24-cv-80722- GAYLES/GOODMAN

DANIEL J. STERMER, as receiver for
NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ, *et. al.*,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

_____ /

CERTIFICATION OF MARK W. KINGHORN

Mark W. Kinghorn, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the North Carolina Bar (28623); USDC, North Carolina, Eastern District; USDC, North Carolina, Middle District; USDC, North Carolina, Western District; U.S. Court of Appeals for the 4th Circuit; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.

/s/ Mark W. Kinghorn
Mark W. Kinghorn

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 9:24-cv-80722-GAYLES/GOODMAN

DANIEL J. STERMER, as receiver for
NATIONAL SENIOR INSURANCE, INC.
D/B/A SEEMAN HOLTZ, *et. al.*,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,

Defendant.

**ORDER GRANTING MOTION TO APPEAR
PRO HAC VICE, CONSENT TO DESIGNATION AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* for Mark W. Kinghorn, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the “Motion”), pursuant to the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Mark W. Kinghorn may appear and participate in this action on behalf of Wells Fargo Bank, N.A. The Clerk shall provide electronic notification of all electronic filings to Mark W. Kinghorn, at mkinghorn@mcguirewoods.com.

DONE AND ORDERED in Chambers at West Palm Beach, Florida, this ____ day of _____, 2024.

United States District Judge

Copies furnished to: All Counsel of Record