

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**In re:**

**TOYS “R” US, INC., et al.,**

**Debtors.**

**Chapter 11**

**Case No. 17-34665 (KLP)**

**(Joint Administration Requested)**

**MOTION PURSUANT TO  
LOCAL RULE 2090-1(E)(2) FOR ADMISSION PRO HAC VICE**

Cullen D. Speckhart (“Movant”), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and a Shareholder with Wolcott Rivers Gates hereby moves the Court, pursuant to this motion (the “Motion”), for the entry of an order, substantially in the form of **Exhibit A**, authorizing Matthew S. Barr (“Mr. Barr”), an attorney in the law firm of Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153-0199, to appear and practice *pro hac vice* on behalf of LEGO Systems, Inc. in the above-captioned chapter 11 cases now pending in the United States Bankruptcy Court for the Eastern District of Virginia and any related adversary litigation pursuant to Rule 2090-1(E)(2) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia (the “Local Rules”). In support of this Motion, Movant states as follows:

1. Mr. Barr is admitted, practicing, and in good standing as a member of the bar of the State of New York. There are no disciplinary proceedings pending against Mr. Barr.

Cullen D. Speckhart (VSB No. 79096)  
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*Counsel to LEGO Systems, Inc.*

Matthew S. Barr  
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*Counsel to LEGO Systems, Inc.*

2. Pursuant to Local Rule 2090-1(E)(2), “an attorney from another state, the District of Columbia or a territory of the United States may appear and practice in cases *pro hac vice* before this Court upon motion of a member of the Bar of this Court, provided that in all appearance said attorney shall be accompanied by a member of this Bar. Applicants for *pro hac vice* admission shall complete and written application, which shall be appended to and incorporated by reference in the aforesaid motion.”

3. Movant requests the Court to allow Mr. Barr to appear at hearings in these chapter 11 cases.

4. Movant has provided notice of this Motion to all persons receiving electronic notice in these bankruptcy cases.

5. An Application pursuant to Local Rule 2090-1(E)(2)(a) is attached hereto as **Exhibit B.**

*[Remainder of this page intentionally left blank.]*

WHEREFORE, the Movant respectfully requests the Court enter the Order granting the relief requested herein and such other relief as the Court deems just and proper.

Dated: September 19, 2017

Respectfully submitted,

By: /s/ Cullen D. Speckhart

Cullen D. Speckhart (VSB No. 79096)

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*Counsel to LEGO Systems, Inc.*

**Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**In re:**

**TOYS “R” US, INC., *et al.*,**

**Debtors.**

**Chapter 11**

**Case No. 17-34665 (KLP)**

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**ORDER GRANTING MOTION PURSUANT TO  
LOCAL RULE 2090-1(E)(2) FOR ADMISSION *PRO HAC VICE***

Upon the Motion (the “Motion”) of Cullen D. Speckhart of Wolcott Rivers Gates for the admission *pro hac vice* of Matthew S. Barr (“Mr. Barr”), an attorney in the law firm of Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, NY 10153-0199, and it appearing that the relief requested is in the best interests of the Debtors’ estates, their creditors and other parties in interest; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); venue being proper before this court pursuant to 28 U.S.C. §§ 1408 and 1409; and after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

1. The Motion is granted in its entirety.
2. Matthew S. Barr is authorized to appear and practice *pro hac vice* as an attorney for LEGO System, Inc. in the above-captioned chapter 11 case.
3. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: \_\_\_\_\_

Richmond, Virginia

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

**WE ASK FOR THIS:**

/s/ Cullen D. Speckhart

Cullen D. Speckhart (VSB No. 79096)  
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-and-

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*Counsel to LEGO Systems, Inc.*

**Exhibit B**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: \_\_\_\_\_, \* Case Name \_\_\_\_\_

PERSONAL STATEMENT

FULL NAME (no initials, please) \_\_\_\_\_  
Bar Identification Number \_\_\_\_\_ State \_\_\_\_\_  
Firm Name \_\_\_\_\_  
Firm Phone # \_\_\_\_\_ Direct Dial # \_\_\_\_\_ FAX # \_\_\_\_\_  
E-Mail Address \_\_\_\_\_  
Office **Mailing** Address \_\_\_\_\_  
Name(s) of federal court(s) in which I have been admitted \_\_\_\_\_

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.

\_\_\_\_\_  
(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*.

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Typed or Printed Name)

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