

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION  
[www.flmb.uscourts.gov](http://www.flmb.uscourts.gov)

In re:

Chapter 11

RMS TITANIC, INC., *et al.*,

Case No.: 3:16-bk-002230-PMG

Debtors.

Jointly Administered

OFFICIAL COMMITTEE OF EQUITY  
SECURITY HOLDERS OF PREMIER  
EXHIBITIONS, INC.,

Adv. Case No.: 18-ap-00064-PMG

Plaintiff,

MARK A SELLERS, DOUGLAS  
BANKER, RICHARD KRANIAK, JACK  
H. JACOBS, DAOPING BAO, SELLERS  
CAPITAL, LLC, and SELLERS CAPITAL  
MASTER FUND, LTD.,

Defendants.

**MOTION FOR ADMISSION OF ALAN F. CURLEY TO PRACTICE  
PRO HAC VICE, DESIGNATION OF LOCAL COUNSEL AND CONSENT TO ACT**

Alan F. Curley of Robinson Curley P.C. (the “Movant”), pursuant to Local Rule 2090-1, moves this Court for admission *pro hac vice*, to appear in this, and any related proceedings, as counsel for Mark A. Sellers, Jack H. Jacobs, and Sellers Capital, LLC, and states as follows:

1. Movant is an attorney licensed to practice law and is a member of good standing of the state bar of Illinois. *See* attached **Exhibit A**.

2. Movant is also admitted to practice before and is in good standing with the United States District Courts for the Northern District of Illinois and the District of Colorado.

3. Movant designates John T. Rogerson, III, as resident Florida attorney, of Adams and Reese LLP, who is qualified to practice in this Court and who consents to 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 Illinois or any other state, nor from any United States Bankruptcy Court, District Court or Court of Appeals.

5. Movant certifies that he has not previously moved for admission *pro hac vice* to appear in a proceeding in the United States District Court for the Middle District of Florida, except that he was co-counsel for a creditor in several related individual bankruptcy cases in this district in the mid-1990's and may have been admitted *pro hac vice* in those cases. Movant has been unable to confirm this as the firm's records of the matter are no longer in existence.

6. Movant certifies further that he will make himself familiar with and shall be governed by the local rules of this Court, the rules of professional conduct and all other requirements governing the Middle District of Florida Bankruptcy Court and the Jacksonville Division of the United States Bankruptcy Court.

7. Within fourteen (14) days from the date of an order granting this Motion, Movant shall pay to the Clerk of the United States District Court for the Middle District of Florida an Attorney Special Admission Fee in the amount of \$150.00 accompanied by a copy of the Court's order. Upon payment of the fee, Movant shall file a Notice of Compliance with the Clerk of the United States Bankruptcy Court.

WHEREFORE, Movant respectfully requests entry of an order authorizing his admission to practice and represent Mark A. Sellers, Jack H. Jacobs, and Sellers Capital, LLC in this case and any related proceedings.

**ROBINSON CURLEY P.C.**

By: /s/ Alan F. Curley  
Alan F. Curley  
Illinois Bar No.: 6190685  
[acurley@robinsoncurley.com](mailto:acurley@robinsoncurley.com)  
300 South Wacker Drive, Suite 1700  
Chicago, IL 60606  
(312) 663-3100 x204  
(312) 663-0303 (facsimile)

*[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]*

**CONSENT TO ACT AS LOCAL COUNSEL**

I, John T. Rogerson, III, an attorney qualified to practice in this Court, consent to designation as the local attorney for Alan F. Curley of Robinson Curley P.C., and agree to serve as designee with whom the Court and opposing counsel may readily communicate regarding the conduct of this case and any related proceedings, and upon whom papers shall be served.

**ADAMS AND REESE LLP**

By: /s/ John T. Rogerson, III

John T. Rogerson, III  
Florida Bar No.: 832839  
[John.rogerson@arlaw.com](mailto:John.rogerson@arlaw.com)

Jamie W. Olinto  
Florida Bar No. 0085179  
[jamie.olinto@arlaw.com](mailto:jamie.olinto@arlaw.com)

Thomas P. White  
Florida Bar No.: 112776  
[Tom.white@arlaw.com](mailto:Tom.white@arlaw.com)

501 Riverside Avenue, Suite 601  
Jacksonville, FL 32202  
(904) 355-1700  
(904) 355-1797 (facsimile)

*Attorneys for Mark A. Sellers,  
Jack H. Jacobs, and Sellers Capital, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused the foregoing Motion for Admission of Alan F. Curley to Practice *Pro Hac Vice*, Designation of Local Counsel and Consent to Act to be served using the Court's CM/ECF system to those parties registered to receive electronic notices of filing in this case this 2nd day of July, 2018.

/s/ John T. Rogerson, III

Attorney

# **EXHIBIT A**

## **Certificate of Admission To the Bar of Illinois**

I, Carolyn Taft Grosboll, Clerk of the Supreme Court of Illinois, do hereby certify that

Alan Francis Curley

has been duly licensed and admitted to practice as an Attorney and Counselor at Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on 11/07/1985 and is in good standing, so far as the records of this office disclose.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name and affixed the  
seal of said Court, this 29th day of  
June, 2018.

*Carolyn Taft Grosboll*

Clerk,  
Supreme Court of the State of Illinois