STEARNS WEAVER MILLER, P.A. Museum Tower, Suite 2200 150 West Flagler Street Miami, Florida 33130

Telephone (Main): (305) 789-3200 Telephone (Direct): (305) 789-3473 Facsimile: (305) 789-3395

Eugene E. Stearns, Esq. Counsel for David Mayer

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Adv. Pro. No. 08-01789 (SMB)

Plaintiff-Applicant,

SIPA Liquidation

BERNARD L. MADOFF INVESTMENT

SECURITIES LLC,

v.

(Substantively Consolidated)

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,

Plaintiff,

v.

RAFAEL MAYER, DAVID MAYER, MONTPELLIER INTERNATIONAL LTD., PRINCE ASSETS LTD. (f/k/a PRINCE ASSETS LDC), KHRONOS GROUP LTD. (f/k/a MONTPELLIER RESOURCES LTD.), PRINCE RESOURCES LDC, MONTPELLIER USA HOLDINGS LLC, PRINCE CAPITAL PARTNERS LLC, and KHRONOS LIQUID OPPORTUNITIES FUND LTD.,

Defendants.

Adv. Pro. No. 20-01316 (SMB)

MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE

I, Eugene E. Stearns, request admission, *pro hac vice*, before the Honorable Stuart M. Bernstein, to represent David Mayer, a defendant in the above-referenced adversary proceeding.

I submit the Affidavit attached hereto as Exhibit A in support of this motion.

As shown in the Certificate of Good Standing issued on February 25, 2021, attached hereto as Exhibit B, I am a member in good standing of the Bar of the State of Florida.

I have submitted the filing fee of \$200.00 together with this motion.

WHEREFORE, I respectfully request that my motion for admission, *pro hac vice*, to represent Defendant David Mayer in this action be granted.

Dated: February 26, 2021

Respectfully submitted,

By: /s/ Eugene E. Stearns
EUGENE E. STEARNS
Florida Bar No. 149335
estearns@stearnsweaver.com

STEARNS WEAVER MILLER WEISSLER ALHADEFF & SITTERSON, P.A. Museum Tower, Suite 2200 150 West Flagler Street Miami, Florida 33130

Telephone (Main): (305) 789-3200 Telephone (Direct): (305) 789-3473 Facsimile: (305) 789-3395

Counsel for David Mayer

Exhibit A

STEARNS WEAVER MILLER, P.A.

Museum Tower, Suite 2200 150 West Flagler Street

Miami, Florida 33130

Telephone (Main):

(305) 789-3200

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(305) 789-3473

Facsimile:

(305) 789-3395

Matthew M. Graham, Esq. Counsel for David Mayer

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

BERNARD L. MADOFF INVESTMENT

SECURITIES LLC,

V.

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,

Plaintiff,

 V_{i}

RAFAEL MAYER, DAVID MAYER,
MONTPELLIER INTERNATIONAL LTD.,
PRINCE ASSETS LTD. (f/k/a PRINCE
ASSETS LDC), KHRONOS GROUP LTD.
(f/k/a MONTPELLIER RESOURCES LTD.),
PRINCE RESOURCES LDC, MONTPELLIER
USA HOLDINGS LLC, PRINCE CAPITAL
PARTNERS LLC, and KHRONOS LIQUID
OPPORTUNITIES FUND LTD.,

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 20-01316 (SMB)

AFFIDAVIT OF EUGENE E. STEARNS, ESQ. IN SUPPORT OF MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE*

20-01316-smb Doc 10-1 Filed 02/26/21 Entered 02/26/21 12:32:03 Exhibit A - Affidavit of Eugene E. Stearns Esq. in Support of Motion for Admiss Pg 3 of 3

I, Eugene E. Stearns, being duly sworn, hereby depose and say the following under the penalty of perjury:

1. I am a shareholder at the law firm of Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A. in Miami, Florida, and am counsel for Defendant David Mayer. I am familiar with the proceedings in this case. I attest to the matters below based on personal knowledge.

2. I submit this Affidavit in support of my motion to be admitted, *pro hac vice*, to represent Defendant David Mayer in the above-captioned matter pursuant to Rule 2090-1 of the Local Bankruptcy Rules for the Southern District of New York.

3. As shown in the Certificate of Good Standing issued on February 25, 2021, I am a member in good standing of the Bar of the State of Florida.

4. I have never been convicted of a felony.

5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court.

6. There are no disciplinary proceedings presently against me.

Dated: February 24, 2021

Miami, Florida

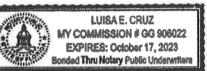
Eugene E. Stearns

STATE OF FLORIDA COUNTY OF MIAMI-DADE

The foregoing instrument was acknowledge before me this 25th day of February.

2021, by Evgene E. Steams, who is personally known to me and who did/did
not take an oath

not take an oath.



Notary Public

Exhibit B



651 East Jefferson Street Tallahassee, FL 32399-2300

Joshua E. Doyle
Executive Director

State of Florida

County of Leon

In Re: 0149335
Eugene E Stearns
Stearns Weaver Et Al 150 W Flagler St Ste 2200
Miami, FL 33130-1545

I CERTIFY THE FOLLOWING:

I am the custodian of membership records of The Florida Bar.

Membership records of The Florida Bar indicate that The Florida Bar member listed above was admitted to practice law in the state of Florida on **October 6**, **1972**.

The Florida Bar member above is an active member in good standing of The Florida Bar who is eligible to practice law in the state of Florida.

Dated this 25th day of February, 2021.

Cynthia & Gaelsa

Cynthia B. Jackson, CFO Administration Division

The Florida Bar

PG:R10 CTM-124033

