

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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Facsimile: (305) 789-3395  
Matthew M. Graham, Esq.  
*Counsel for David Mayer*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

<p>SECURITIES INVESTOR PROTECTION CORPORATION,</p> <p style="text-align: center;">Plaintiff-Applicant,</p> <p style="text-align: center;">v.</p> <p>BERNARD L. MADOFF INVESTMENT SECURITIES LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Adv. Pro. No. 08-01789 (SMB)</p> <p>SIPA Liquidation</p> <p>(Substantively Consolidated)</p>
<p>In re:</p> <p>BERNARD L. MADOFF,</p> <p style="text-align: center;">Debtor.</p>	
<p>IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, and Bernard L. Madoff,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>RAFAEL MAYER, DAVID MAYER, MONTEPELLIER INTERNATIONAL LTD., PRINCE ASSETS LTD. (f/k/a PRINCE ASSETS LDC), KHROSOS GROUP LTD. (f/k/a MONTEPELLIER RESOURCES LTD.), PRINCE RESOURCES LDC, MONTEPELLIER USA HOLDINGS LLC, PRINCE CAPITAL PARTNERS LLC, and KHROSOS LIQUID OPPORTUNITIES FUND LTD.,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. Pro. No. 20-01316 (SMB)</p>

**MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE**

I, Matthew M. Graham, 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 24, 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 25, 2021

Respectfully submitted,

By: /s/ Matthew M. Graham

MATTHEW M. GRAHAM

Florida Bar No. 86764

[mgraham@stearnsweaver.com](mailto:mgraham@stearnsweaver.com)

STEARNS WEAVER MILLER WEISSLER

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*Counsel for David Mayer*

# **Exhibit A**

STEARNS WEAVER MILLER, P.A.  
Museum Tower, Suite 2200  
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Miami, Florida 33130  
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Matthew M. Graham, Esq.  
*Counsel for David Mayer*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION  
CORPORATION,  
  
Plaintiff-Applicant,  
  
v.  
  
BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,  
  
Defendant.

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In re:  
  
BERNARD L. MADOFF,  
  
Debtor.

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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), KHROS GROUP LTD.  
(f/k/a MONTPELLIER RESOURCES LTD.),  
PRINCE RESOURCES LDC, MONTPELLIER  
USA HOLDINGS LLC, PRINCE CAPITAL  
PARTNERS LLC, and KHROS LIQUID  
OPPORTUNITIES FUND LTD.,  
  
Defendants.

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

SIPA Liquidation

(Substantively Consolidated)

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

AFFIDAVIT OF MATTHEW M.  
GRAHAM, ESQ. IN SUPPORT OF  
MOTION FOR ADMISSION TO  
PRACTICE, *PRO HAC VICE*

I, Matthew M. Graham, 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 24, 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.

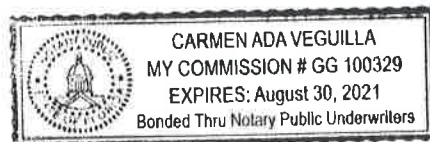
Dated: February 24, 2021  
Miami, Florida

  
Matthew M. Graham

STATE OF FLORIDA  
COUNTY OF MIAMI-DADE

The foregoing instrument was acknowledge before me this 24<sup>th</sup> day of February, 2021, by Matthew M. Graham, who is personally known to me and who did/did not take an oath.

  
Notary Public



# **Exhibit B**



# The Florida Bar

651 East Jefferson Street  
Tallahassee, FL 32399-2300

Joshua E. Doyle  
Executive Director

850/561-5600  
www.FLORIDABAR.org

State of Florida )

County of Leon )

In Re: 0086764  
Matthew M Graham  
Stearns Weaver Miller, 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 **November 4, 2010**.

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 24th day of **February, 2021**.

A handwritten signature in black ink that reads "Cynthia B. Jackson".

Cynthia B. Jackson, CFO  
Administration Division  
The Florida Bar

PG:R10  
CTM-123843

