

J. David Folds, VSB No. 44068
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Attorneys for Virium BV, VFR Holdings BV, Mas Arbos Invest BV,
and Piet Mazereeuw Beheer BV

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:)	
)	No. 14-14527
LITHIUM TECHNOLOGY CORP.,)	
Debtor)	
<hr/>)	
VIRIUM BV, VFR HOLDING BV,)	Chapter 11
MAS ARBOS INVEST BV, PIET)	
MAZEREEUW BEHEER BV)	
Movants,)	
)	
v.)	
)	Contested matter
LITHIUM TECHNOLOGY CORP.,)	
Respondent.)	
<hr/>)	

MOTION TO ADMIT PRO HAC VICE

I, J. David Folds, hereby move this Court for an Order authorizing Melvin A. Simon, Esq., and Scott D. Rosen, Esq. (together, "Admittees"), of the law firm Cohn Birnbaum & Shea, P.C., to appear and represent Virium BV, VFR Holdings BV, Mas Arbos Invest BV, and Piet Mazereeuw Beheer BV in the above-referenced matter. In support of this Motion, I state as follows:

1. I am a member of good standing of the Bar of the Commonwealth of Virginia and the U.S. Bankruptcy Court for the Eastern District of Virginia. I will be associating with the Admittees in this matter.

2. Mr. Simon is a member in good standing of the Bar of the State of Connecticut.

3. Mr. Rosen is a member in good standing of the Bar of the State of Connecticut.

4. Each of the Admittees has the following business address:

Cohn Birnbaum & Shea, P.C.
100 Pearl Street
Hartford, CT 06103

5. Neither of the Admittees has been the subject of disciplinary action by the bar of any state, or any state or federal court.

6. Neither of the Admittees has been denied admission to the courts of any state or to any federal court.

7. Both the Admittees have completed an Application to Qualify as required under Local Rule 2090-1, copies of which are attached as **Exhibit A**.

8. A proposed order granting this motion is also being submitted contemporaneously with the filing of this Motion.

For these reasons, I respectfully request that the Court grant this Motion and permit the Admittees to represent Virium BV, VFR Holdings BV, Mas Arbos Invest BV, and Piet Mazereeuw Beheer BV in the above-referenced matter.

Dated: December 11, 2014

Respectfully submitted,

/s/ J. David Folds

J. David Folds, VSB No. 44068
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Berkowitz, P.C.

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*Counsel for Virium B.V., VFR Holdings BV,
Mas Arbos Invest BV, and Piet Mazereeuw
Beheer BV*

CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2014, a copy of the foregoing was served by U.S. Mail, First Class, postage prepaid on the following:

Michael E. Hastings
Whiteford Taylor & Preston LLP
114 Market Street
Suite 210
Roanoke, VA 24011
540-759-3579
Fax : 540-759-3569
Email: mhastings@wtplaw.com

Counsel for Debtor

Judy A. Robbins, U.S. Trustee
Office of the U.S. Trustee - Region 4
115 South Union Street, Room 210
Alexandria, VA 22314
703-557-7176

/s/ J. David Folds
J. David Folds, VSB No. 44068

Exhibit A

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

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

In Case No.: 14-14527-BFK, * Case Name Lithium Technology Corporation

PERSONAL STATEMENT

FULL NAME (no initials, please) Melvin Arnold Simon
Bar Identification Number 102832 State CT
Firm Name Cohn Birnbaum & Shea P.C.
Firm Phone # 860-493-2000 Direct Dial # 860-493-2208 FAX # 860-727-0361
E-Mail Address msimon@cbshealaw.com
Office Mailing Address 100 Pearl Street, 12th Floor, Hartford, CT 06103
Name(s) of federal court(s) in which I have been admitted U.S. District Courts for Conn., SDNY and EDNY

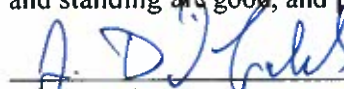
I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

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)

12/11/2014
(Date)

J. David Folds
(Typed or Printed Name)

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

Court Use Only:

The motion for admission is GRANTED _____ or DENIED _____

(Judge's Signature)

(Date)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

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

In Case No.: 14-14527-BFK, * Case Name Lithium Technology Corporation


PERSONAL STATEMENT

FULL NAME (no initials, please) Scott David Rosen
Bar Identification Number 402483 State CT
Firm Name Cohn Birnbaum & Shea P.C.
Firm Phone # 860-493-2000 Direct Dial # 860-493-2220 FAX # 860-727-0361
E-Mail Address srosen@cbshealaw.com
Office Mailing Address 100 Pearl Street, 12th Floor, Hartford, CT 06103
Name(s) of federal court(s) in which I have been admitted U.S. District Courts for CT, SDNY & EDNY, U.S. Court of Appeals for the Second Circuit.

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.


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(Signature)

12/11/2014
(Date)

J. David Folds
(Typed or Printed Name)

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

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Debtor)	
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v.)	Contested matter
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LITHIUM TECHNOLOGY CORP.,)	
Respondent.)	
<hr/>)	

PROPOSED ORDER

After consideration of the pending Motion to admit Melvin A. Simon, Esq., and Scott D. Rosen, Esq., to appear and practice before this Court *pro hac vice* in the above-styled case, it is hereby ORDERED that the Motion is GRANTED.

Dated: December __, 2014

UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

/s/ J. David Folds
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Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C.
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