

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**
www.flmb.uscourts.gov

| | |
|--|---------------------------|
| In re: | Chapter 11 |
| Landmark Holdings of Florida, LLC, | Case No. 2:25-bk-00397 |
| | Jointly Administered With |
| Landmark Management Services of Florida, LLC, | Case No. 2:25-bk-00398 |
| Landmark Rehabilitation Hospital of Columbia, LLC, | Case No. 2:25-bk-00399 |
| Landmark Hospital of Athens, LLC, | Case No. 2:25-bk-00400 |
| Landmark Hospital of Cape Girardeau, LLC, | Case No. 2:25-bk-00401 |
| Landmark Hospital of Columbia, LLC, | Case No. 2:25-bk-00402 |
| Landmark Hospital of Joplin, LLC, | Case No. 2:25-bk-00403 |
| Landmark Hospital of Savannah, LLC, | Case No. 2:25-bk-00404 |
| Debtors. ¹ | |

**MOTION FOR ADMISSION OF JENNIFER E. WUEBKER
TO APPEAR PRO HAC VICE**

Jennifer E. Wuebker, Esquire, of Hunton Andrews Kurth LLP (“Movant”), pursuant to Rule 2090-1(c) of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida (the “Local Rules”), moves this Court for admission pro hac vice, to appear in this and

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Landmark Holdings of Florida, LLC (1217); Landmark Management Services of Florida, LLC (7031); Landmark Rehabilitation Hospital of Columbia, LLC (5424); Landmark Hospital of Athens, LLC (2745); Landmark Hospital of Cape Girardeau, LLC (1155); Landmark Hospital of Columbia, LLC (5424); Landmark Hospital of Joplin, LLC (9493); and, Landmark Hospital of Savannah, LLC (8003).

any related adversary proceeding as counsel for the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) and states as follows:

1. Movant is an attorney licensed to practice law and is a member of good standing of the bars of the Commonwealth of Virginia (Virginia State Bar No. 91184), the District of Columbia (DC Bar No. 1035039), and the State of Texas (Texas State Bar No. 24098639).

2. Movant is also admitted to practice before and is in good standing with the United States District Court for the Eastern District of Virginia, the United States District Court for the Western District of Virginia, the United States District Court for the District of Columbia, the United States District Court for the Western District of Texas, and the United States District Court for the Southern District of Texas.

3. Movant designates Jamie Zysk Isani, a resident Florida attorney, of Hunton Andrews Kurth LLP, who is qualified to practice in this Court and who consents to designation as local counsel. Local counsel’s written designation and consent to act is attached as **Exhibit A**.

4. Movant certifies that she has never been disbarred and is not currently suspended from the practice of law in the Commonwealth of Virginia, District of Columbia, and State of Texas, nor from any United States Bankruptcy Court, District Court, or Court of Appeals.

5. Movant certifies that she 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 as follows: *In re Red Lobster Management LLC*, Case No. 6:24-bk-02486-GER (Doc. 134).

6. Movant certifies further that she will make herself familiar with and shall be governed by the Local Rules, the rules of professional conduct, and all other requirements governing the Middle District of Florida District Court and the Bankruptcy Division of the United States District Court.

7. Within fourteen 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 her admission to practice and represent the Debtors in this case and any related proceedings.

[Remainder of page intentionally left blank]

Fort Myers, Florida
Dated: March 11, 2025

Respectfully submitted,

/s/ Jennifer E. Wuebker

HUNTON ANDREWS KURTH LLP

Jamie Z. Isani (FL 728861)

333 SE 2nd Avenue, Suite 2400

Miami, Florida 33131

Telephone: (305) 810-2500

Facsimile: (305) 810-2460

Email: jisani@hunton.com

- and -

Justin F. Paget (*pro hac vice* pending)

Jennifer E. Wuebker (*pro hac vice* pending)

951 E. Byrd Street

Richmond, Virginia 23219

Telephone: (804) 788-8200

Facsimile: (804) 788-8218

Email: jpaget@hunton.com

jwuebker@hunton.com

*Proposed Counsel to the Debtors
and Debtors in Possession*

CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2025 a true and correct copy of the foregoing *Motion for admission of Jennifer E. Wuebker to Appear Pro Hac Vice* has been served to all registered CM/ECF recipients.

Respectfully submitted,

/s/ Jennifer E. Wuebker

Jennifer E. Wuebker

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**
www.flmb.uscourts.gov

| | |
|--|---------------------------|
| In re: | Chapter 11 |
| Landmark Holdings of Florida, LLC, | Case No. 2:25-bk-00397 |
| | Jointly Administered With |
| Landmark Management Services of Florida, LLC, | Case No. 2:25-bk-00398 |
| Landmark Rehabilitation Hospital of Columbia, LLC, | Case No. 2:25-bk-00399 |
| Landmark Hospital of Athens, LLC, | Case No. 2:25-bk-00400 |
| Landmark Hospital of Cape Girardeau, LLC, | Case No. 2:25-bk-00401 |
| Landmark Hospital of Columbia, LLC, | Case No. 2:25-bk-00402 |
| Landmark Hospital of Joplin, LLC, | Case No. 2:25-bk-00403 |
| Landmark Hospital of Savannah, LLC, | Case No. 2:25-bk-00404 |
| Debtors. ¹ | |

WRITTEN DESIGNATION AND CONSENT TO ACT AS LOCAL COUNSEL

I, Jamie Zysk Isani, an attorney qualified to practice in this Court, consent to designation as the local attorney for Jennifer E. Wuebker of Hunton Andrews Kurth LLP, and agree to serve

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Landmark Holdings of Florida, LLC (1217); Landmark Management Services of Florida, LLC (7031); Landmark Rehabilitation Hospital of Columbia, LLC (5424); Landmark Hospital of Athens, LLC (2745); Landmark Hospital of Cape Girardeau, LLC (1155); Landmark Hospital of Columbia, LLC (5424); Landmark Hospital of Joplin, LLC (9493); and, Landmark Hospital of Savannah, LLC (8003).

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.

Fort Myers, Florida
Dated: March 11, 2025

Respectfully submitted,

/s/ Jamie Z. Isani

HUNTON ANDREWS KURTH LLP

Jamie Z. Isani (FL 728861)

333 SE 2nd Avenue, Suite 2400

Miami, Florida 33131

Telephone: (305) 810-2500

Facsimile: (305) 810-2460

Email: jisani@hunton.com

*Proposed Local Counsel to the Debtors
and Debtors in Possession*

PURSUANT TO LOCAL RULE 1001-2(G)(3) REGARDING SIGNATURES, JAMIE Z. ISANI ATTESTS THAT CONCURRENCE IN THE FILING OF THIS PAPER HAS BEEN OBTAINED.