

**UNITED STATES BANKRUPTCY
EASTERN DISTRICT OF LOUISIANA**

IN RE:

COPSYNC, INC.

Debtor

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CASE NO.: 17-12625

CHAPTER 11

**MOTION FOR ADMISSION OF WINIFRED H. DOMINGUEZ
TO APPEAR PRO HAC VICE**

NOW INTO COURT comes Winifred H. Dominguez (“Movant”), a member in good standing of the Bar of the State of Texas, an attorney admitted to practice before the United States District Courts of Texas for the Western and Southern Districts of Texas, the Fifth Circuit Court of Appeals, as well as the Texas Eastern, Western, and Southern Bankruptcy Courts, and is a shareholder with the law firm Walsh Gallegos Treviño Russo & Kyle P.C. (“WGTRK”), and hereby moves for entry of an order permitting Movant to practice *pro hac vice*, before the United States Bankruptcy Court for the Eastern District of Louisiana to represent Creditor, New Braunfels Independent School District (“Creditor”) pursuant to Local Bankruptcy Rule 2014-1, in the above-captioned case. Upon the annexed Affidavit of Winifred H. Dominguez, in support of the Motion, Movant states as follows:

1. Movant has been a member in good standing of the Bar of the State of Texas, Texas Bar No. 05965700, since November 1987, and remains in good standing as of the filing of this Motion. Movant is a shareholder with WGTRK, 100 NE Loop 410, Suite 900, San Antonio, Texas 78216. In addition she is admitted to practice before the United States District Courts of Texas for the Western and Southern Districts, Fifth Circuit Court of Appeals, as well as the Eastern, Western, and Southern Bankruptcy Courts for the State of Texas. There are no disciplinary proceedings pending against Movant.

2. Movant requests that this Court allow this Motion so that Movant may file pleadings and appear and be heard at hearings in this bankruptcy and any and all adversary proceedings in this case. Movant requests, pursuant to Local Rule 2014-1, that Movant be authorized to make appearances in this Court without being accompanied by a member of the Bar of the Bankruptcy Court for the Eastern District of Louisiana and that Movant be authorized to sign and file pleadings, notices, and other court documents without such pleadings, notices, and other court documents being signed by a member of the Bar of the Bankruptcy Court for the Eastern District of Louisiana.

3. Filed contemporaneously herewith as Exhibit "A" is a letter from Linda A. Acevedo, Chief Disciplinary Counsel for the State Bar of Texas certifying Movant is an active member in good standing with the State Bar of Texas.

WHEREFORE, Movant respectfully requests the Court enter an Order, (i) permitting Movant to appear *pro hac vice* as counsel for Creditor in the above-captioned Chapter 11 case under the conditions set forth above, and (ii) granting such other and further relief as is just and equitable.

Respectfully submitted:
**WALSH GALLEGOS TREVIÑO
RUSSO & KYLE P.C.**

By: /s/ Winifred H. Dominguez
WINIFRED H. DOMINGUEZ
State Bar No. 05965700
100 NE Loop 410, Suite 900
San Antonio, Texas 78216
Phone: (210) 979-6633
Fax: (210) 979-7024
E-Mail: wdominguez@wabsa.com

Attorney for Creditor:
New Braunfels Independent School District

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the Motion for Admission of Winifred H. Dominguez to Appear Pro Hac Vice has been served upon all parties listed below via the courts CM/ECF electronic filing system and/or on the attached mailing matrix via email correspondence and/or by placing a copy in the United States Mail, first class, postage prepaid and properly addressed this 9th day of November, 2017.

- | | |
|--|--|
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| 13. Office of the United States
Trustee | USTPRegion05.NR.ECF@usdoj.gov |

/s/ Winifred H. Dominguez
WINIFRED H. DOMINGUEZ

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LIMITED MASTER MAILING MATRIX

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Top 20 Unsecured Creditors

Brewer & Association
Consulting IDS Center
Suite 900
80 South Eighth Street
Minneapolis, Minnesota 55402

Brother Mobil Solutions, Inc.
P.O. Box 200877
Pittsburgh, Pennsylvania 15251-0877

CDW.g
75 Remittance Drive, Suite 1515
Chicago, Illinois 60675-1515

City of Dalhart Police Department
P.O. Box 2005
Dalhart, Texas 79022

City of Pharr
1900 S. Cage
Pharr, Texas 78577

County of Crockett Sheriff's Office
P.O. Box 1931
Ozona, Texas 76943

County of Hutchinson Sheriff's Office
1400 Veta Street
Borger, Texas 79007

County of Live Oak Sheriff's Office
200 Larry R. Busby Drive
George West, Texas 78022-3777

County of Moore Sheriff's Office
700 South Bliss
Dumas, Texas 79029

County of Wheeler Sheriff's Office
P.O. Box 88
Wheeler, Texas 79096

Falls County Sheriff's Office
2847 Highway 6
Marlin, Texas 76661

Fiedman, LLC
301 Lippincott Drive, 4th Floor
Marlton, NJ 08053

Goodwin
100 Northern Avenue
Boston, Massachusetts 02210

Harter Secrest & Emery LLP
1500 Bausch & Lomb Place
Rochester, New York 14604-2711

Microsoft Corporation
P.O. Box 841800
Dallas, Texas 75284-1800

Perryton Police Department
21 SE 2nd Avenue
Perryton, Texas 78070

Pryor Cashman LLP
7 Times Square
New York, New York 10036

Robert Half Management Resources
P.O. Box 743295
Los Angeles, California 90074-3295

San Augustine County Sheriff's Office
219 North Harrison
San Augustine, Texas 75975

Votronics
1505 Capital Avenue
Plano, Texas 75074

Secured Creditors

Chrysler Capital
P.O. Box 660335
Dallas, Texas 75266-0335

Dominion Capital LLC
341 W. #8th Street
Suite 800
New York, New York 10018

Expansion Capital Group
6001 S. Sharon Avenue
Suite 6
Sioux Falls, South Dakota 57106

MEF I, LLP
40 Wall Street
New York, New York 10005

Live Oak Factoring

Patsy's Leasing
31 Hall Street
Concord, New Hampshire 03301

Prosperity Bank
1805 FM 2673
Canyon Lake, Texas 78133

Thinkstream Acquisition, LLC dba Kologik
c/o Brandon A. Brown, Stewart Robbins & Brown, LLC
301 Main Street
Suite 1640
Baton Rouge, Louisiana 70801

Walter Morales

Governmental/Priority Creditors

Internal Revenue Service
1555 Poydras Street
New Orleans, Louisiana 70112

Louisiana Workforce Commission
1001 N. 23rd Street
Baton Rouge, Louisiana 70802

U.S. Securities and Exchange Commission
Attn: Barbara L. Gunn, Asst. Rel. Dir.
Fort Worth Regional Office
801 Cherry Street, Suite 29th Floor
Fort Worth, Texas 76102

U.S. Securities and Exchange Commission
Office of Investor Education & Advocacy
100 F. Street NE
Washington, DC 20549

Louisiana Department of Revenue
617 North Third Street
Baton Rouge, Louisiana 70802

U.S. Department of Labor
Attn: Limei Zhang
Wage and Hour Investigator
1701 East Lamar Blvd., Suite 270
Arlington, Texas 76096

United States Justice Department
600 Jefferson Street
Lafayette, Louisiana 70501

Notice of Appearances

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Missouri Department of Revenue
Bankruptcy Unit
Attn: Steven A Ginther
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Jefferson City, Missouri 65105

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Langley@carverdarden.com

Request to Receive Notices Pursuant to Motion to Establish Notice Procedures

Wampum Books, LLC
Attn: Stephanie A. Duckworth
103 Edward Drive
Franklin Park, New Jersey 08823

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AFFIDAVIT OF WINIFRED H. DOMINGUEZ

STATE OF TEXAS

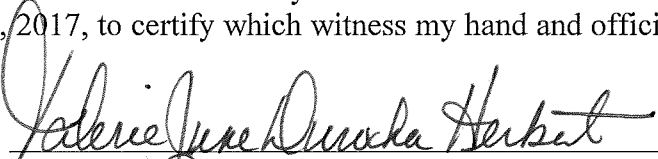
COUNTY OF BEXAR

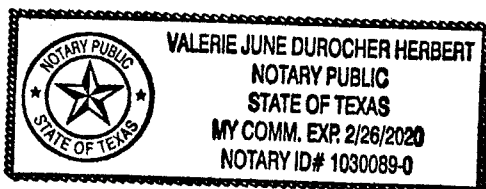
BEFORE ME, the undersigned authority duly qualified and commissioned in and for the County of Bexar, State of Texas, personally came and appeared, WINIFRED H. DOMINGUEZ, who, after begin duly sworn, did depose and stated the following:

1. She is a person of the full age of majority and a resident of the State of Texas.
2. She is a member in good standing of the State Bar of Texas and the United States District Courts of Texas for the Western and Southern Districts, Fifth Circuit Court of Appeals, as well as the Texas Eastern, Western, and Southern Bankruptcy Courts, and has not been the subject of any disciplinary proceedings or criminal charges by the bar or courts during the last five (5) years.
3. She has not been denied admission to the courts of any state or to any federal court during the last five (5) years.


WINIFRED H. DOMINGUEZ

SUBSCRIBED AND SWORN TO BEFORE ME by the said WINIFRED H. DOMINGUEZ on this 9th day of November, 2017, to certify which witness my hand and official seal.


Notary Public, State of Texas



STATE BAR OF TEXAS



Office of the Chief Disciplinary Counsel

November 08, 2017

Re: Ms. Winifred Henderson Dominguez, State Bar Number 05965700

To Whom It May Concern:

This is to certify that Ms. Winifred Henderson Dominguez was licensed to practice law in Texas on November 06, 1987, and is an active member in good standing with the State Bar of Texas. "Good standing" means that the attorney is current on payment of Bar dues; has met Minimum Continuing Legal Education requirements; and is not presently under either administrative or disciplinary suspension from the practice of law.

This certification expires 30 days from the date, unless sooner revoked or rendered invalid by operation of rule or law.

Sincerely,

Linda A. Acevedo
Chief Disciplinary Counsel
LA/web

