IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:	§	**CASE NO. 02-B49675**
	§	
CONSECO FINANCE CORPORATION	§	
	§	
	§	
DEBTORS	§	**CHAPTER 11**

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
MAR 11 2004
KENNETH S. GARDNER, CLERK
PS REP. - CS

MOTION TO APPEAR PRO HAC VICE
WITHOUT NECESSITY OF LOCAL COUNSEL

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Karon Y. Wright, Assistant County Attorney for Travis County, Texas, hereinafter "Movant," requesting permission to appear before this Court for the limited purpose of representing Travis County, Texas, in the above styled case. In support of this motion, Movant would show this court the following:

1. Movant is a licensed attorney in the State of Texas and is a member in good standing of the Texas State Bar Association. Movant's State Bar Number is 22044700 and her business mailing address is Post Office Box 1748, Austin, Texas 78767, (512) 854-9513.

2. Movant is admitted to practice before the United States District Court for the Eastern, Northern, Southern, and Western Districts of Texas; the United States Court of Appeals for the Fifth Circuit; and the District of Columbia Court of Appeals.

3. Movant is not at this time nor has she ever been the subject of any type of legal disciplinary action.

4. Movant requests that she be allowed to appear without the necessity of local counsel. Movant has just cause to appear without local counsel because Movant represents a governmental entity and does not receive fees on this case. Movant intends

to appear at all hearings involving her client, Travis County, Texas.

WHEREFORE, PREMISES CONSIDERED, Movant prays for this Court to grant this Motion as requested and any further relief to which Movant may show herself justly entitled.

Respectfully submitted,
DAVID ESCAMILLA
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BY: _____
KARON Y. WRIGHT
Assistant County Attorney
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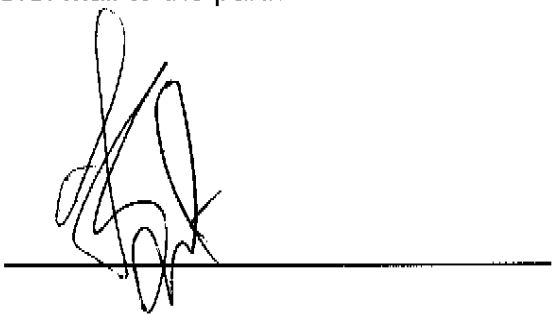
CERTIFICATE OF SERVICE

I, Karon Y. Wright, Assistant County Attorney for Travis County, Texas do hereby certify that a true and correct copy of the **Motion to Appear Pro Hac Vice Without Necessity of Local Counsel** has been sent by U.S. mail to the parties listed below on the 10th day of March, 2004.



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