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

In re:	)	
	)	Case No. 02 B49675
CONSECO FINANCE CORP., *et al.*,	)	Jointly Administered
	)	Chapter 11 Cases
Debtors.	)	
	)	Honorable Carol A. Doyle
	)	
	)	
	)	

FILED
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
MAR 1 2 2004
KENNETH S. GARDNER, CLERK
PS REP. - PS

ROUTINE MOTION AND APPLICATION
FOR LEAVE TO APPEAR *PRO HAC VICE*

Theodore J. Hartl ("Movant") of the firm of Jessop & Company, P.C., pursuant to Local Bankruptcy Rule 9013-9(A), for his Routine Motion And Application for Leave to Appeal *Pro Hac Vice* (this "Motion"), states:

1. Local Rule 2090-3 of the United States Bankruptcy Court for the Northern District of Illinois governs the admission *pro hac vice* of visiting counsel in this case. Movant requests the Court admit him *pro hac vice* in order to appear and participate on behalf of Front Range Equity Specialists, Inc. ("Front Range"), in proceedings in this case.

2. In support of this Motion, Movant represents to the Court as follows:

A. Movant is a member of the Bar of the State of Colorado and is admitted to practice before the United States District Court for the District of Colorado and the United States Court of Appeals for the Tenth Circuit.

B. Movant is a member in good standing of the foregoing courts in which he has been admitted and Movant has not been disciplined by any court or administrative body.

C. Attached to this Motion as **Exhibit A** is Movant's Application for Leave to

Appear Pro Hac Vice (the "Application") and a copy of a check evidencing payment of the fee for *pro hac vice* admission under Local Rule 83.14 of the United States District Court for the Northern District of Illinois.

3. Movant hereby requests, pursuant to Local Rule 2090-4(A) that he be excused for cause shown from designating a member of the bar of the District Court with an office in this district upon whom service may be made. The matters involving Front Range for which this Motion is filed are relatively minor, consisting of Front Range's total claim of $11,302.68 and allegedly preferential prepetition transfers made to Front Range in the ordinary course of business. Front Range desires to resolve these matters efficiently without unnecessary costs.

4. The Committee Note to Local Rule 2090-4 recognizes that a waiver of the requirements of designating local counsel may be "appropriate . . . in view of the nationwide jurisdiction of the Bankruptcy Court and the need to recognize economic burdens in relatively small matters."

5. Movant and Movant's law firm are familiar with the local rules and practice before this Court. Douglas W. Jessop ("Jessop"), principal shareholder of the firm of Jessop & Company, P.C., and certain associate attorneys with Jessop & Company, P.C., have been admitted in this Court *pro hac vice* in the case of *In re UAL Corp., et al.*, case number 02-B-48191 (the "UAL Case"), in connection with representation of the City and County of Denver, Denver International Airport and the City and County of San Francisco, by and through its Airport Commission. In the UAL Case, Jessop designated Gregg Szilagyi, of the law firm of Ungaretti & Harris as local co-counsel upon whom service of all papers could be made. Movant respectfully requests a waiver of the designation of local counsel requirement in this relatively small matter involving Front Range.

6. A proposed form of order is appended hereto as **Exhibit B**, in accordance with Local Bankruptcy Rule 9013-9.

WHEREFORE, Theodore J. Hartl respectfully requests that the Court enter its order granting this Motion approving the Application and admitting him *pro hac vice* and excusing the requirements of designating local counsel for the purpose of representing Front Range in the above-referenced bankruptcy case and related adversary proceedings or related contested matters.

Dated this 5th day of March, 2004.

Respectfully submitted,

JESSOP & COMPANY, P.C.

By: _____

Douglas W. Jessop, Colo. Bar #13299
Theodore J. Hartl, Colo. Bar #32409
303 East 17th Avenue, Suite 930
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Telephone: (303) 860-7700
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Email: tjhartl@jessopco.com

Attorneys for Front Range Equity Specialists, Inc.

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on the 5th day of March, 2004, the foregoing **Notice of Filing of Routine Motion and Application for Admission *Pro Hac Vice***, the **Routine Motion and Application for Admission *Pro Hac Vice*** and the accompanying exhibits were served via overnight delivery service (Federal Express) to the parties listed hereunder:

Thomas J. Augspurger
c/o Kirkland & Ellis, LLP
200 East Randolph Drive, Suite 6500
Chicago, IL 60601

Andre Zafrani
John T. Gregg
c/o Greenberg Traurig, P.C.
77 West Wacker Drive, Suite 2500
Chicago, IL 60601

EXHIBIT A

(Revised 02/01/01)

United States District Court Northern District of Illinois
APPLICATION FOR LEAVE TO APPEAR PRO HAC VICE

Case Title:	In re Conseco Finance Corp., et al.	Plantiff(s)
	VS.	
		Defendant(s)
Case Number: 02-49675 CAD	Judge: Hon. Carol A. Doyle	

I, Theodore J. Hartl with the law firm of Jessop & Company, P.C., hereby apply to the Court under Local Rule 83.14 for permission to appear and participate in the above-entitled action on behalf of Front Range Equity Specialists, Inc. by whom I have been retained.

I am a member in good standing and eligible to practice before the following courts:

Title of Court	DateAdmitted
Supreme Court of Colorado	11/20/00
United States District Court for the District of Colorado	10/11/01
United States Court of Appeals for the Tenth Circuit	10/11/01

I have currently, or within the year preceding the date of this application, made pro hac vice applications to this Court in the following actions:

Case Number	Case Title	Date of Application (Granted or Denied)*
	n/a	

*If denied, please explain:
(Attach additional form if necessary)

Pursuant to Local Rule 83.15(a), applicants who do not have an office within the Northern District of Illinois must designate, at the time of filing their initial notice or pleading, a member of the bar of this Court having an office within this District upon who service of papers may be made.

Has the applicant designated local counsel? Yes ☐ No ☑*

If you have not designated local counsel, Local Rule 83.15(b) provides that the designation must be made within thirty (30) days.

* Motion to waive designation requirement under Local Bankruptcy Rule 2090-4 pending.

Has the applicant ever been:

censured, suspended, disbarred, or otherwise disciplined by any court?	Yes	☐	No	☑
or is the applicant currently the subject of an investigation of the applicant's professional conduct?	Yes	☐	No	☑
transferred to inactive status, voluntarily withdrawn, or resigned from the bar of any court?	Yes	☐	No	☑
denied admission to the bar of any court?	Yes	☐	No	☑
held in contempt of court?	Yes	☐	No	☑

NOTE: If the answer to *any* of the above questions is yes, please attach a brief description of the incident(s) and the applicant's current status before any court, or any agency thereof, where disciplinary sanctions were imposed, or where an investigation or investigations of the applicant's conduct may have been instituted.

I have read the Rules of Professional Conduct for the Northern District of Illinois, effective November 12, 1991 (Local Rules 83.50 through 83.58), and the Standards for Professional Conduct within the Seventh Federal Judicial Circuit, effective December 15, 1992, and will faithfully adhere to them. I declare under penalty of perjury that the foregoing is true and correct.

03/05/04

Date

Signature of Applicant

Applicant's Name	Last Name Hartl		First Name Theodore	Middle Name/Initial J.
Applicant's Law Firm	Jessop & Company, P.C.			
Applicant's Address	Street Address 303 East 17th Avenue			Room/Suite Number 930
	City Denver	State CO	ZIP Code 80203	Work Phone Number (303) 860 7700

(The pro hac vice admission fee is $100.00 for cases filed before February 1, 2001, and $50.00 for cases filed on or after that date, and shall be paid to the Clerk. No admission under Rule 83.14 is effective until such time as the fee has been paid.)

(Fee Stamp)

NOTE: Attorneys seeking to appear pro hac vice may wish to consider filing a petition for admission to the general bar of this Court. The fee for admission to the General Bar is $100.00 The fee for pro hac vice admission is $100.00 for cases filed before February 1, 2001, and $50.00 for cases filed on or after that date. Admission to the general bar permits an attorney to practice before this Court. Pro hac vice admission entitles an attorney to appear in a particular case only. Application for such admission must be made in each case; and the admission fee must be paid in each case.

ORDER

IT IS ORDERED that the applicant herein may appear in the above-entitled case.

DATED: _____

United States District Judge

Jessop & Company, P. C.
Office Account
303 East 17th Avenue, Suite 930
Denver, CO 80203-1262
(303) 860-7700

WELLS FARGO BANK WEST
NATIONAL ASSOCIATION
EAGLE, CO 81631
29-7/1020

10175

3/5/2004

PAY TO THE ORDER OF Clerk, U. S. District Court $ **50.00

Fifty and 00/100********** DOLLARS

MEMO Front Range/Conseco

⑈010175⑈ ⑆102000076⑆1048126656⑈

Jessop & Company, P. C. 10175

Clerk, U. S. District Court	3/5/2004	
Client Advances		50.00

operating	Front Range/Conseco	50.00

EXHIBIT B