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Counsel for the individual trustees Gary Conley,  
Richard Davis, Douglas Guerdat, and Nora Quinn  
and the Proposed Auto Retiree VEBA Trust

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

Oldco M Corporation  
(f/k/a Metaldyne Corporation), *et al.*,

Debtors.

Chapter 11

Case No. 09-13412-mg

(Jointly Administered)

**MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

I, Gary M. Kaplan, a member in good standing of the bar of the State of California and the U.S. District Court for the Northern, Eastern, Central, and Southern Districts of California, hereby request admission, *pro hac vice*, before Honorable Martin Glenn, U.S. Bankruptcy Judge, to represent the individual trustees Gary Conley, Richard Davis, Douglass Guerdat, and Nora Quinn and the Proposed Auto Retiree VEBA Trust in connection with all the above-referenced Chapter 11 cases.

My Address is: Farella Braun + Martel LLP  
235 Montgomery Street, 17<sup>th</sup> Floor  
San Francisco, CA 94104  
Email Address: gkaplan@fbm.com  
Telephone Number: (415) 954-4940  
California State Bar Number: 155530

I agree to pay the required filing fee of \$200 upon approval by this Court admitting me to practice *pro hac vice*.

Respectfully submitted,

Dated: September 12, 2011

FARELLA BRAUN + MARTEL LLP

By: /s/ Gary M. Kaplan  
GARY M. KAPLAN

Counsel for the individual trustees  
Gary Conley, Richard Davis, Douglass  
Guerdat, and Nora Quinn and the Proposed  
Auto Retiree VEBA Trust