## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

	)
In re:	) Chapter 11
	)
ORECK CORPORATION, et al.	) Case No. 3:13-bk-04006
	)
Debtor.	) Judge Lundin
	) (Jointly Administered)

## MOTION FOR ADMISSION OF IVAN L. KALLICK PRO HAC VICE

Pursuant to Local Bankruptcy Rule 2090-1(b), Karlen Williams Graybill Advertising, Inc. ("Karlen Williams"), respectfully moves the Court to admit Ivan L. Kallick of the law firm of Manatt, Phelps & Phillips, LLP to appear *pro hac vice* in order to represent Karlen Williams in the above-referenced bankruptcy proceeding. In support of this Motion, Movant would state unto the Court as follows:

- 1. Mr. Kallick is a partner in the law firm of Manatt, Phelps & Phillips, LLP, resident in the firm's Los Angeles, California office.
- 2. Mr. Kallick is admitted to practice law in the state of California and before the United States District Court for the Central District of California and the United States Court of Appeals for the Ninth Circuit. A Certificate of Standing from the United States District Court for the Central District of California is being filed herewith.
- 3. Mr. Kallick is a member in good standing of the Bar of the State of California and is not under suspension or disbarment from any Bar in which he is a member.
- 4. As required by Local Bankruptcy Rule 2090-1(b)(2), Mr. Kallick will be associated with John C. Hayworth and Jason W. Callen of Walker Tipps & Malone PLC, who are licensed in, in good standing in, reside in and maintain their principal office in Tennessee, as Local Counsel for Karlen Williams in connection with this bankruptcy proceeding.

WHEREFORE, Movant respectfully requests that the Court enter an order admitting Ivan L. Kallick to appear before the Court *pro hac vice* as counsel for Karlen Williams Advertising, Inc. in all matters in this proceeding, and granting such further or other relief as the Court deems appropriate.

Dated: July 2, 2013 Respectfully submitted,

WALKER, TIPPS & MALONE PLC

/s/John C. Hayworth
John C. Hayworth, Esq. (#16133)
Jason W. Callen, Esq. (#26225)
150 Fourth Avenue North
2300 One Nashville Place

Nashville, Tennessee 37219

Tel: 615-313-6000 Fax: 615-313-6001

Email: jhayworth@walkertipps.com jcallen@walkertipps.com

Counsel for Karlen Williams Graybill Advertising, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to those parties specifically requesting electronic service. The following parties will be served via first class, U.S. mail, postage prepaid:

William L. Norton III Bradley Arant Boult Cummings, LLP 1600 Division Street, Suite 700 Nashville, TN 27203 United States Trustee 318 Customs House 701 Broadway Nashville, TN 37203

Beth R. Derrick Assistant U.S. Trustee Office of United States Trustee 318 Customs House 701 Broadway Nashville, TN 37203

on this the 2nd day of July, 2013.

The parties may access this filing through the Court's electronic filing system.

/s/ John C. Hayworth
John C. Hayworth