

In re:

Debtor.

Chapter 11

Case No. 3:13-bk-04006

Judge Lundin

(Jointly Administered)

Pursuant to Local Bankruptcy Rule 2090-1(b), Karlen Williams Graybill Advertising, Inc. ("Karlen Williams"), respectfully moves the Court to admit Ileana M. Hernandez 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. Ms. Hernandez is a partner in the law firm of Manatt, Phelps & Phillips, LLP, resident in the firm's Los Angeles, California office.

2. Ms. Hernandez 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. Ms. Hernandez 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 she is a member.

4. As required by Local Bankruptcy Rule 2090-1(b)(2), Ms. Hernandez 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 Ileana M. Hernandez 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. A proposed Order has been filed herewith.

Dated: July 2, 2013

Respectfully submitted,

WALKER, TIPPS & MALONE PLC

/s/John C. Hayworth

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*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