

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

IN RE:)
) Case No.: 13-04006-KL3-11
ORECK CORPORATION, *et al.*,)
) Judge Keith M. Lundin
Debtors.) (Jointly Administered)

**MOTION OF QVC, INC. TO ALLOW FOR
TELEPHONIC PARTICIPATION OF NATHANIEL METZ**

Comes QVC, Inc. (“QVC”), a creditor and party-in-interest in this case, and respectfully requests permission to have its Wayne, Pennsylvania attorney, Nathaniel Metz, Esquire, participate telephonically in the hearing on the Debtors’ motion to approve a sale of its assets scheduled for July 16, 2013 at 9:00 a.m. In support hereof, QVC respectfully states as follows:

1. On May 16, 2013, the Debtor filed its Motion Pursuant to 11 U.S.C. §§ 363(B), (F), and (M), and 365 and Fed. R. Bankr. P. 2002, 6004 and 6006 to (I) Approve (A) the Sale Transaction Pursuant to the Asset Purchase Agreement with Oreck Acquisition Holding LLC, Free and Clear of Claims, Liens, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases and (II) Establish Sale and Bidding Procedures; and (B) Schedule a Sale Approval Hearing (Docket No. 93) (the “Sale Motion”).

2. On June 20, 2013, the Debtors’ Supplemental Expedited Order Pursuant to 11 U.S.C. §§ 363, and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006 (I) Approving Procedures for Sale of Debtors’ Assets and Expense Reimbursement Pursuant to Asset Purchase Agreement with Oreck Acquisition Holdings LLC; (II) Scheduling Bid Deadline and Sale Hearing Date; (III) Establishing Assumption and Assignment Procedures; and (IV) Fixing Notice Procedures

and Approving Form of Notice (Docket No. 361) was entered. A hearing on the Sale Motion is presently scheduled for Tuesday, July 16, 2013, at 9:00 a.m.

3. QVC's long-time counsel on all matters related to the Debtors is Nathaniel Metz, Esquire, of the Wayne, Pennsylvania office of Saul Ewing LLP. QVC has retained Gullett, Sanford, Robinson & Martin, PLLC, of Nashville, Tennessee, as QVC's local counsel.

4. QVC respectfully requests that Nathaniel Metz be permitted to participate telephonically at the July 16, 2013 hearing. Nathaniel Metz's telephone number is (610) 251-5099. Local counsel, M. Taylor Harris, Jr., will appear in person at the July 16, 2013 hearing.

5. Notice of this motion shall be provided electronically to all parties requesting electronic service in this case.

Wherefore, QVC respectfully prays:

1. That Nathaniel Metz with the law firm of Saul Ewing LLP be permitted to participate telephonically at the July 16, 2013 hearing; and

2. That the Court grant such other and further relief to which Movant may be entitled.

A proposed order granting this motion is filed herewith.

This the 11th day of July, 2013.

Respectfully submitted,

/s/ Thomas H. Forrester

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Counsel for QVC, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on July 11, 2013, a true and correct copy of the foregoing document was filed electronically. Notice of this filing was sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Thomas H. Forrester
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