UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION

IN RE:

PILGRIMP'S PRIDE CORPORATION, ET AL. CHAPTER 11
CASE NO.: 08-45664

MAY KING
MOVANT,

VS.

PILGRIMS PRIDE
RESPONDENT.

MOTION FOR PERMITION TO
PRACTICE PRO HAC VICE

COMES NOW, Neil Taylor, Jr., and says that he is a member in good standing as a practicing lawyer of the U.S. District Court for the Northern District of Alabama with its principal court house in Birmingham, Alabama, as shown in the attached Certificate of Good Standing.

Neil; Taylor, Jr., is the attorney of record for May King, an injured worker's compensation claimant. The caption case is: May King vs. Pilgrims pride, NW Alabama Division, Case No.: CV-07-165. He prays leave to be permitted to appear in the Chapter 11 Bankruptcy proceedings for the purpose of asking that the stay be lifted so that the amount due may be known, if insured the estate would not be diminished. If not insured the amount of the claim needs to be known and the state court of Alabama is a better forum to decide the applicable

Alabama Worker's Compensation law since worker's compensation claims go to court in Alabama.

He also ask that he be allowed to appear generally for the injured claimant, May King, in the above Chapter 11 proceeding.

Neil Taylor, Jr.
NEIL TAYLOR, JR. (ASB-8486-O64H)
Attorney for May King
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CERTIFICATE OF SERVICE

I hereby certify that on this the 17th day of March, 2009, mailed a copy of the above and foregoing by First Class U. S. Mail, postage prepaid to:

Hon. Robert P. Brown
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