

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

In re:)	
)	
RC SOONER HOLDINGS, LLC, <i>et al.</i> , ¹)	Case No. 10–12185-R
)	Chapter 11
)	
Debtors.)	(Jointly Administered)
_____)	
)	
RC SOONER HOLDINGS, LLC, <i>et al.</i>)	
and OLD SOUTH APARTMENTS, LLC,)	
)	
Plaintiffs,)	
vs.)	Adv. Pro. No. 10–01070-R
)	
BANK OF THE WEST, <i>et al.</i> ,)	
)	
_____)	
Defendants.)	
)	
RC SOONER HOLDINGS, LLC, <i>et al.</i>)	
and OLD SOUTH APARTMENTS, LLC,)	
)	
Plaintiffs,)	
vs.)	Adv. Pro. No. 10–01071-R
)	
REMYCO., INC., <i>et al.</i> ,)	
)	
_____)	
Defendants.)	

MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE* OF SEAN J. BELLEW

Emily M. Jones (“Movant”), pursuant to Bankr. N.D.Okla. LR 9010-1(B), and in turn, to the extent applicable, N.D.Okla. LCvR 83.2(g), hereby moves this Court for an Order admitting *pro hac vice* Sean J. Bellew (“Bellew”) of Ballard Spahr LLP to practice law in this Court in these jointly administered bankruptcy cases and proceedings. In support of this *Motion*, Movant would certify to the Court as follows:

¹ The Debtors and the last four digits of their taxpayer identification numbers are: RC Sooner Holdings, LLC (7904); RC Brixton Square Owner, LLC (8002); RC Cedar Crest Owner, LLC (7914); RC Fulton Plaza Owner, LLC (8011); RC Magnolia Owner, LLC (7998); RC Pomeroy Park Owner, LLC (7939); RC Salida Owner, LLC (7947); RC Savannah South Owner, LLC (7983); RC Southern Hills Owner, LLC (7958); Brixton Square Apartments, LLC (1844); CC Apartments, LLC (1798); Fulton Plaza Apartments, LLC (4344); Magnolia Manor Apartments, LLC (4486); Pomeroy Park Apartments, LLC (1649); Salida Apartments, LLC (1915); Savannah South Apartments, LLC (8586); and Southern Hills Villa Apartments, LLC (1721). The business address for each of the Debtors where notices should be sent is 1515 Broadway, 11th Floor, New York, New York, 10036-8901.

1. Bellew resides in the State of Delaware and is a licensed attorney regularly engaged in the practice of law in the State of Delaware.

2. Bellew has been admitted to practice and is a member in good standing of the State Bars of Delaware and New Jersey, and the Commonwealth of Pennsylvania, as well as the United States District Courts for the District of Delaware and the Eastern District of Pennsylvania. Bellew is also familiar with the local rules of this Court.

3. Movant has been admitted to practice and is a member in good standing in this Court.

4. The *Request for Admission Pro Hac Vice* of Sean J. Bellew, required by LCvR 83.2(g), is attached hereto as Exhibit A.

5. A proposed Order accompanies this *Motion* and is being submitted to this Court.

WHEREFORE, Movant respectfully requests that this Court grant this *Motion* and admit Bellew to practice before this Court *pro hac vice* and allow Bellew to participate in any and all aspects of the bankruptcy proceedings of the above-styled and numbered causes, including any and all adversary proceedings, as provided for under the Federal Rules of Civil Procedure, Federal Rules of Bankruptcy Procedure, and all Local Rules of this Court.

Respectfully submitted,

SNEED LANG HERROLD PC

By: /s/ Emily M. Jones
David H. Herrold, OBA # 17053
Emily M. Jones, OBA #21719
1700 Williams Center Tower I
One West Third Street
Tulsa, Oklahoma 74103-4212
Telephone: (918) 588- 1313
Facsimile: (918) 588-1314

Email: dherrold@sneedlangherrold.com
ejones@sneedlangherrold.com

*Proposed Local Counsel for the Debtors and
Debtors in Possession*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 13th day of July, 2010, she caused a true and correct copy of the above and foregoing instrument to be electronically filed through the CM/ECF System maintained by the U.S. Bankruptcy Court for the Northern District of Oklahoma and **believes** said CM/ECF System **should generate** a 'Notice of Electronic Filing,' transmitting a true and correct copy of said filing to the following counsel for parties in the Delaware bankruptcy proceeding who consented to such electronic service pursuant to Fed.R.Bankr.P. 7005 and 9036, Fed.R.Civ.P. 5(b)(2)(E) and 5(d)(3); **however, in an abundance of caution, the undersigned has, in addition, caused the foregoing instrument to be delivered electronically to listed e-mail addressees to ensure electronic service on the date stated above:**

Daniel K. Astin on behalf of Creditor Bank of the West
dastin@ciardilaw.com, vfrew@ciardilaw.com

Mary E. Augustine on behalf of Creditor Bank of the West
maugustine@bglawde.com

Mary E. Augustine on behalf of Defendant Bank of the West
maugustine@bglawde.com

Sean J. Bellew on behalf of Plaintiff Old South Apartments, LLC
bellews@ballardspahr.com

Noel C. Burnham on behalf of Attorney Burnham Law Associates, LLC
nburnham@burnhamlawassociates.com

Christopher S. Chow on behalf of Debtor Brixton Square Apartments, LLC
chowc@ballardspahr.com

Tobey M. Daluz on behalf of Debtor RC Sooner Holdings, LLC
daluzt@ballardspahr.com

John D. Demmy on behalf of Creditor Public Service Company of Oklahoma d/b/a
American Electric Power jdd@stevenslee.com

Kristi J. Doughty on behalf of Creditor PNC Bank, N.A.
bk.service@aulgur.com

David A. Felice on behalf of Plaintiff Old South Apartments, LLC
feliced@ballardspahr.com

Gary H. Kaplan on behalf of Defendant Sperry Van Ness/William T. Strange & Associates, Inc. ghkaplan@mdwecg.com, jmbarrowclough@mdwecg.com,
aemoore@mdwecg.com, awlefco@mdwecg.com

Margaret M. Manning on behalf of Creditor Oklahoma Energy Source, LLC
mmanning@klehr.com

David T. May on behalf of Debtor RC Sooner Holdings, LLC
maydt@ballardspahr.com

John D. McLaughlin on behalf of Creditor Bank of the West
jmclaughlin@ciardilaw.com, vfrew@ciardilaw.com, ddorgan@ciardilaw.com,
gpatel@ciardilaw.com

Rachel B. Mersky on behalf of Creditor Fannie Mae
rmersky@monlaw.com

Natalie D. Ramsey on behalf of Attorney Montgomery McCracken Walker & Rhoads
LLP nramsey@mmwr.com

Thomas Patrick Tinker thomas.p.tinker@usdoj.gov

United States Trustee USTPREGION03.WL.ECF@USDOJ.GOV

The undersigned further certifies that on this same date, she caused a true and correct copy of the above and foregoing instrument to be deposited into the U.S. Mails, all postage prepaid thereon, addressed to the following counsel of record not currently receiving Notices of Electronic Filing through the CM/ECF System maintained by the U.S. Bankruptcy Court for the Northern District of Oklahoma:

BMC Group
444 N Nash St
El Segundo, CA 90245

Aaron E. Moore on behalf of Defendant Sperry Van Ness/William T. Strange & Associates, Inc.
Marshall Dennehey Warner Coleman & Goggi
1845 Walnut Street
Philadelphia, PA 19103-4797

Katherine Vance, Esq.
Assistant U.S. Trustee
224 South Boulder Avenue, Room 225
Tulsa, Oklahoma 74103

Assistant United States Attorney
Ellen W. Slights, Esquire
U.S. Attorney's Office
1007 Orange Street, Suite 700
P.O. Box 2046
Wilmington, DE 19899-2046

Ballard Spahr LLP
(RE: Counsel for Debtors)
Christopher S. Chow, Esquire
919 N. Market Street, 12th Floor
Wilmington, DE 19801

Ballard Spahr LLP
(RE: Counsel for Debtors)
Matthew G. Summers, Esquire
300 East Lombard Street
18th Floor
Baltimore, MD 21202-3268

Ballard Spahr LLP
(RE: Counsel for Debtors)
Sean J. Bellew, Esquire
919 N. Market Street, 12th Floor
Wilmington, DE 19801

Ballard Spahr LLP
(RE: Counsel for Debtors)
Tobey M. Daluz, Esquire
919 N. Market Street, 12th Floor
Wilmington, DE 19801

Chief Office of Special Litigation
US Dept of Justice- Tax Division,
PO Box 7238
Washington, DC 20044

David May
(RE: Atty for Debtor)
Ballard Spahr LLP
919 N. MARKET STREET, 12TH
FLOOR
WILMINGTON, DE 19801

EasyTel Communications
7335 South Lewis Avenue, Suite
100
Tulsa, OK 74136

Internal Revenue Service
11601 Roosevelt Blvd., Mail Drop
N7
P.O. Box 21126
Philadelphia, PA 19114

JP Morgan Chase Bank, N.A.
Attn: Daniel F. Geres
P.O. Box 260180
Baton Rouge, LA 70826-0180

Law Firm of Russell R Johnson,
PLC
(RE: Public Svc OK/AEP)
John M Craig, Esq
2258 Wheatland Dr
Manakin-Sabot, VA 23103

Law Firm of Russell R Johnson,
PLC
(RE: Public Svc Okla/AEP)
Russell R Johnson III, Esq
2258 Wheatland Dr
Manakin-Sabot, VA 23103

Margaret Manning
(RE: Atty Oklahoma Energy
Source, LLC)
Klehr Harrison Harvey Branzburg
LLP
919 N. Market Street, Suite 100
Wilmington , DE 19801

Monzack Mersky Mclaughlin &
Browder
(RE: Fannie Mae)
Rachel B Mersky Esq
1201 N Orange St
Ste 400
Wilmington, DE 19801

Office of the United States
Trustee
224 South Boulder Avenue, Suite
225
Tulsa, OK 74103

Okla. Empl. Sec. Comm.
PO Box 53039
Oklahoma City, OK 73152

Oklahoma Tax Commission
120 N. Robinson, Suite 200W
Oklahoma City, OK 73102

Oklahoma Tax Commission
Legal Division
PO Box 53248
Oklahoma City, OK 73152

Public Service of Oklahoma
P.O. Box 24421
Canton, OH 44701-4421

Secretary of State
Divisions of Corporations
Franchise Tax
P.O. Box 7040
Dover, DE 19903

Secretary of the Treasury
Attn: Officer, Managing Agent
or General Agent
P.O. Box 7040
Dover, DE 19903

Securities and Exchange
Commission
Attn: Christopher Cox
100 F Street, NE
Washington, DC 20549

Securities and Exchange
Commission
George S. Canellos
Regional Director
233 Broadway
New York, NY 10279

Stevens & Lee, PC
(RE: Public Svc OK/AEP)
John D Demmy
1105 North Market St, 7th Fl
Wilmington, DE 19801

Tulsa County Treasurer
500 South Denver
Tulsa, OK 74103

US Attorney
110 West 7th Street, Suite 300
Tulsa, OK 74119

US Securities & Exchange Comm
Midwest Regional Office
175 W. Jackson Blvd., Suite 900
Chicago, IL 60604

Ciardi Ciardi & Astin
(RE: Bank of the West)
D Astin/J McLaughlin/M
Augustine
Citizens Bank Center
919 Market St, Ste 700
Wilmington, DE 19801

Ciardi Ciardi & Astin
(RE: Bank of the West)
D Astin/J McLaughlin/M
Augustine
Citizens Bank Center
919 Market St, Ste 700
Wilmington, DE 19801

Ciardi Ciardi & Astin
(RE: Bank of the West)
D Astin/J McLaughlin/M Augustine
Citizens Bank Center
919 Market St, Ste 700
Wilmington, DE 19801

Doerner Saunders Daniel &
Anderson
(RE: Fannie Mae)
Lewis Carter
320 S Boston
Ste 500
Tulsa, OK 74103

Doerner Saunders Daniel &
Anderson
(RE: Fannie Mae)
Sam G Bratton II
320 S Boston
Ste 500
Tulsa, OK 74103

FELLERS SNIDER
BLANKENSHIP, et al.
(RE: Oklahoma Energy Source)
DONEEN DOUGLAS JONES,
ESQ
CHASE TOWER
100 N. BROADWAY, STE 1700
OKLAHOMA CITY, OK 73102-
8820

RC Sooner Holdings, LLC
c/o Daniel Gordon
1515 Broadway, 11th Floor
New York, NY 10036

Admiral Insurance Company
1255 Calwell Road
Cherry Hill, NJ 08034-3220

AT&T
P.O. Box 105414
Atlanta, GA 30301-1054

City of Owasso
P.O. Box 180
Owasso, OK 74055

City of Owasso
Property Tax Division
P.O. Box 180
Owasso, OK 74055

City of Owasso
Property Tax Division
P.O. Box 180
Owasso, OK 74055

City of Tulsa
Property Tax Division
175 E. 2nd Street, Suite 690
Tulsa, OK 74103

EB Computing
19 Piping Rock Drive
Ossining, NY 10562

F. Robert LaSaracina CPA, LLC
209 West Town Street
Norich, CT 06360

Fannie Mae
3900 Wisconsin Avenue, NW
Washington, DC 20016

JH Choi
611 Broadway, Suite 631
New York, NY 10012

Lloyds of London
John Sawyer
C/O Sawyer Phillips
6666 S Sheridan Oxford Pl, Ste
220
Tulsa, OK 74136

Mid-Century Insurance Company
P.O. Box 2478
Terminal Annex
Los Angeles, CA 90051

Mike Posey
c/o Jack G. Zurawik, Esquire
Re: Case No. CJ 2008-08257
P.O. Box 35346
Tulsa, OK 74153

OKES
Attn: Ken Stangle
8332 East 73rd Street
Tulsa, OK 74133

Oklahoma Natural Gas
P.O. Box 268826
Oklahoma City, OK 73126

RC Realty Management, Inc.
200 Trade Zone Drive
Ronkonkoma, NY 11779

Rosedale Cooley Management,
Inc.
1120 Avenue of the Americas
4th Floor
New York, NY 10036

Rosedale Cooley Management,
Inc.
1120 Avenue of the Americas
4th Floor
New York, NY 10036

Shai Consulting, N.A.
220 5th Avenue
New York, NY 10001

Sneed, Lang, Herrold, PC
David H. Herrold, Esq
1700 Williams Tower I
Tulsa, OK 74103

Utility Services
City of Tulsa
175 E. 2nd Street, Suite 690
Tulsa, OK 74103

Weston Consulting Corp.
17 Weston St
Huntington Station, NY 11746

Weston Consulting Corp.
17 Weston St
Huntington Station, NY
11746

/s/ Emily M. Jones