

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

<b>In re:</b>	)	
	)	
<b>SOFA EXPRESS, INC.</b>	)	<b>Case No. 307-09024</b>
	)	<b>Chapter 11</b>
<b>Debtor.</b>	)	<b>Judge Paine</b>
	)	

**MOTION PURSUANT TO RULE 2090-1(b) OF THE LOCAL  
RULES OF COURT FOR THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE FOR ADMISSION PRO HAC VICE**

Paul G. Jennings (“Movant”), a member of Bass, Berry & Sims PLC, a member in good standing of the Bar of the State of Tennessee and an attorney admitted to practice before the United States District Court for the Middle District of Tennessee, hereby moves the Court to enter an order admitting Kevin J. Simard, attorney with the law firm of Riemer & Braunstein LLP (“Riemer Braunstein”) (the “Admittee”), to practice *pro hac vice* before the United States Bankruptcy Court for the Middle District of Tennessee to represent Wells Fargo Retail Finance, LLC (“Wells Fargo”) in the above-captioned bankruptcy, pursuant to Rule 2090-1(b) of the Local Rules of Court for the United States Bankruptcy Court for the Middle District of Tennessee (the “Local Rules”). In support of this motion, Movant relies on the Certification attached hereto as Exhibit A and states as follows:

1. Kevin J. Simard is an attorney of Reimer Braunstein and maintains an office at Three Center Plaza, Boston, MA 02108-2003. The Admittee is a member in good standing of the Bar of the State of Massachusetts. The Admittee has been admitted to practice before the United States District Courts for the District of Massachusetts, is regularly engaged in

the practice of bankruptcy law in the federal courts of Massachusetts, and has been previously admitted *pro hac vice* to practice in other bankruptcy courts, including The United States Bankruptcy Court for the District of Massachusetts. In addition, there are no disciplinary proceedings pending against him. Accordingly, the Admittee is entitled to admission *pro hac vice* in this chapter 11 case, pursuant to Local Rule, and Movant requests that this Court approve this Motion so that the Admittee may file pleadings and appear and be heard at hearings in this chapter 11 case and all related proceedings.

2. Set forth in Exhibit B hereto is a certificate of good standing offered in support of this motion. Movant requests that this Court grant the relief requested in this Motion so that the Admittee may file pleadings and appear before the Court and be heard in this chapter 11 case and all related proceedings.

3. Attached as hereto is a proposed order admitting the Admittee, to practice *pro hac vice* before this Court to represent Wells Fargo.

WHEREFORE, Movant respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: Nashville, Tennessee  
December 13, 2007

BASS, BERRY & SIMS PLC

/s/ Paul G. Jennings

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*Attorneys for Wells Fargo Retail Finance, LLC*