

**FILED**  
JACKSONVILLE, FLORIDA

**AUG 19 2010**

CLERK, U. S. BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

In re:

Chapter 11

TAYLOR BEAN & WHITAKER  
MORTGAGE CORP.,

Case No. 3:09-BK-07047-JAF

Debtor.

/

**MOTION FOR ADMISSION PRO HAC VICE OF MICHAEL M. PARKER**

TO THE HONORABLE JERRY A. FUNK, UNITED STATES BANKRUPTCY JUDGE:

Pursuant to Local Rule 2090-1(c), Michael M. Parker moves for the admission *pro hac vice* to represent NL Ventures VII Magnolia, LLC (“NL Ventures”) in this matter. Petitioner states the following:

1. I am a member in good standing of the State Bar of Texas, and I do not reside or maintain an office for the practice of law in the Western District of Florida.

2. I am a partner in the law firm of Fulbright & Jaworski L.L.P. and practice law at the office located at 300 Convent Street, Suite 2200, San Antonio, Texas 78205, Telephone: (210) 224-5575, Facsimile: (210) 270-7205, email: [mparker@fulbright.com](mailto:mparker@fulbright.com).

3. The following constitutes a list of each of the state and federal courts to which I have been admitted:

| <b><u>COURTS TO WHICH ADMITTED</u></b>                          | <b><u>LOCATION</u></b> | <b><u>DATE ADMITTED</u></b> |
|---|------------------------|-----------------------------|
| United States Court of Appeals, Fifth Judicial Circuit          | New Orleans, LA        | 1997                        |
| United States District Court for the Western District of Texas  | San Antonio, Texas     | 1994                        |
| United States District Court for the Southern District of Texas | Houston, Texas         | 1995                        |

| <u>COURTS TO WHICH ADMITTED</u>                                 | <u>LOCATION</u> | <u>DATE ADMITTED</u> |
|---|-----------------|----------------------|
| United States District Court for the Northern District of Texas | Dallas, Texas   | 2003                 |
| All State Courts of Texas                                       |                 | 1993                 |
| State Courts of Colorado  |                 | 1994                 |

4. I am eligible to practice in the Bankruptcy Court and agree to familiarize myself with the Local Bankruptcy Court Rules.

5. I am in good standing in all courts in which I have been admitted, I am not currently disbarred or suspended in any court, and no formal grievance proceeding is pending against me.

6. I respectfully request that the Court waive the designation and consent-to-act requirement of Local Bankruptcy Rule 2090-1(c)(1), such that I *not* be required to retain a member of the bar of the Middle District who is a resident in Florida, and such that all notices and papers are served upon me and I maintain responsibility for the progress of the case. The issues of my client, NL Ventures, represent a relatively small piece of this large case and I routinely represent NL Ventures or its affiliates in courts throughout the United States without the assistance of local counsel. It is not cost effective for NL Ventures to retain local counsel in matters such as this and in most bankruptcy cases in which it participates, and I, therefore, respectfully request the Court waive for cause the designation and consent to act requirements of Local Bankruptcy Rule 2090-1(c)(1).

WHEREFORE, PREMISES CONSIDERED, Movant prays that the Court enter an order granting *pro hac vice* admission to Michael M. Parker, waiving the requirement of Local Rule 2090-1(c)(1) to designate local counsel, and granting such other and further relief as the Court deems just.

Dated: August 18, 2010

Respectfully submitted,



Michael M. Parker  
Colorado Bar No.: 024166  
Texas Bar No. 00788163  
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**COUNSEL FOR NL VENTURES VII  
MAGNOLIA, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2010, true and correct copies of the foregoing Motion for Admission *Pro Hac Vice* was served on the entities listed below by United States first-class mail, postage prepaid.

Taylor Bean & Whitaker Mortgage Corp.  
315 N.E. 14<sup>th</sup> Street  
Ocala, FL 34470

United States Trustee – JAX  
135 W Central Blvd, Suite 620  
Orlando, Florida 32801

Paul S. Singerman  
James D. Gassenheimer  
Berger Singerman PA  
200 South Biscayne Boulevard  
Miami, Florida 33131

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Wendell Finner  
Wendell Finner, PA  
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Jacksonville Beach, Florida 32250



Michael M. Parker