

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:) Chapter 11
)
CEP Holdings, LLC, Creative Engineered) Case Nos. 06-61794, 06-61796 and
Polymer Products, LLC and) 06-61797
Thermoplastics Acquisition, LLC,)
) Honorable Russ Kendig
Debtors.)

**APPLICATION OF DAVID M. NEUMANN FOR AN ORDER
ADMITTING ALAN P. SOLOW AND JEREMY M. DOWNS
PRO HAC VICE PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1**

David M. Neumann, an associate in the law firm of Benesch, Friedlander, Coplan & Aronoff, LLP (“BFC&A”), hereby moves the Court pursuant to Local Bankruptcy Rule 2090-1 for an order admitting Alan P. Solow (“Mr. Solow”) and Jeremy M. Downs (“Mr. Downs”) *pro hac vice* to appear as counsel for Wachovia Capital Finance Corporation (Central) (“Wachovia”) before the Court in the above-captioned cases. In support of this motion, David M. Neumann states as follows:

1. Pursuant to Local Bankruptcy Rule 2090-1 of the United States Bankruptcy Court for the Northern District of Ohio, David M. Neumann hereby requests that Mr. Solow and Mr. Downs be admitted *pro hac vice* to appear before this court on behalf of Wachovia in all matters related to or concerning these cases.

2. Mr. Solow and Mr. Downs are attorneys at the law firm of Goldberg, Kohn, Bell, Black, Rosenbloom & Moritz, Ltd. (“Goldberg Kohn”) located at 55 East Monroe Street, Suite 3700, Chicago, Illinois 60603-5802.

3. Mr. Solow is a partner at Goldberg Kohn and is admitted to practice before the

State Bar of Illinois and the United States District Court for the Northern District of Illinois among other courts. Mr. Solow is a member in good standing of the Bar of Illinois and has never suffered disbarment or suspension of his license to practice law in any jurisdiction of the United States. Mr. Solow is prepared to attest to the same at the first hearing scheduled before this Court in this case.

4. Mr. Downs is an associate at Goldberg Kohn and is admitted to practice before the State Bar of Illinois and the United States District Court for the Northern District of Illinois among other courts. Mr. Downs is a member in good standing of the Bar of Illinois and has never suffered disbarment or suspension of his license to practice law in any jurisdiction of the United States. Mr. Downs is prepared to attest to the same at the first hearing scheduled before this Court in this case.

WHEREFORE, the undersigned respectfully requests that the Court enter an order admitting Mr. Solow and Mr. Downs *pro hac vice* to appear before the Court in these cases and granting such other and further relief as is just and proper.

Cleveland, Ohio
September 20, 2006

/s/ David M. Neumann
David M. Neumann (OBR #0068747)
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Local Counsel for Wachovia Capital Finance
Corporation (Central).

CERTIFICATE OF SERVICE

A true copy of the *Motion of David M. Neumann for an Order Admitting Alan P. Solow and Jeremy M. Downs Pro Hac Vice Pursuant to Local Bankruptcy Rule 2090-1* was sent by regular U.S. Mail this 20th day of September, 2006, upon the following:

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The United States Trustee
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222 Merchandise Mart
Washington, PA 15301

Dupont Denemours & Co.
Plz Suite 10-111
Chicago, IL 60654

Du Pont Mexico SA DE CV
Homero 206 15
Chapultepec Morales
Mexico DF 11570

Lanxess Corp.
2112 S. Hamilton Street
Dalton, GA 30720

Chisso America, Inc.
1920 Thoreau Drive N.
Schaumburg, IL 60173

PME Companies
13870 E. 11 Mile Road
Warren, MI 48089

RHODIA
AV.Insurgentes Sur No. 1971
Torres III Piso 6
Colonia Guadalupe Inn
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01020

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Auburn Hills, MI 48326

Innovene USA LLC
13536 Collections Center Drive
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Prudential
200 Wood Avenue, South
Iselin, NJ 08830

Entropex
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/s/ David M. Neumann