

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
AKRON DIVISION

In re

CEP HOLDINGS, LLC, et al.,

Debtors.

Case No. 06-51848-MSS
Chapter 11

Honorable Marilyn Shea-Stonum

MOTION FOR ADMISSION
PRO HAC VICE, PURSUANT TO LOCAL RULE 2090-1

Lee E. Woodard, Esq., and the law firm of Harris Beach PLLC, counsel to Century Mold Mexico, LLC, a 363 bidder for assets of the Debtor-in-Possession, respectfully presents this Motion for Admission *Pro Hac Vice* Pursuant to Local Rule 2090-1 to appear before the United States Bankruptcy Court for the Northern District of Ohio in connection with the above-referenced proceedings.

1. On or about September 20, 2006 (the "Filing Date"), the Debtors, CEP Holdings, LLC; Creative Engineered Polymer Products, LLC; and Thermoplastics Acquisition, LLC (hereinafter "Debtors") each filed separate Voluntary Petitions for Relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et. seq. ("Bankruptcy Code").

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding as defined under 28 U.S.C. § 157(b)(2).

3. Century Mold Mexico, LLC is an interested bidder in certain assets of the Debtor-in-Possession and has tendered an Asset Purchase Agreement to the Debtor which will be filed with the Court in due course.

4. By this Motion and upon the certification attached hereto and incorporated herein by reference as Exhibit "A", the undersigned moves this Court pursuant to Rule 2090-1 of the Local

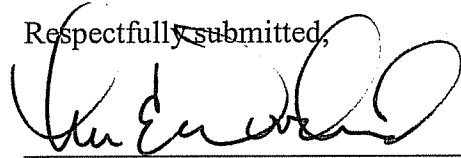
Rules for the Northern District of Ohio for an Order admitting Lee E. Woodard, Esq. to appear before this Court in all matters related to these Chapter 11 proceedings.

5. Lee E. Woodard, Esq., a partner of the firm Harris Beach PLLC, located at One Park Place, 4th Floor, 300 South State Street, Syracuse, New York 13202, is a member in good standing of the Bar of the State of New York and is admitted to practice before the United States District Court for the Northern, Southern, Eastern and Western Districts of New York, the United States District Court for the District of Vermont, the United States Court of Appeals for the Second Circuit; and the United States Supreme Court.

WHEREFORE, the undersigned respectfully requests admission before this Honorable Court *pro hac vice* to represent the interests of Century Mold Mexico, LLC in the above-captioned bankruptcy proceedings.

Dated: November 2, 2006

Respectfully submitted,



Lee E. Woodard, Esq.
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