

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In re:	)	
	)	Case No. 06-51848
CEP HOLDINGS, LLC, <i>et al.</i> , <sup>1</sup>	)	(Jointly Administered)
	)	Chapter 11
Debtors.	)	
	)	Honorable Marilyn Shea-Stonum

**MEMORANDUM IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 2090-1, John H. Ginsberg, on behalf of the Pension Benefit Guaranty Corporation, an agency of the United States Government, hereby applies to the Court for an order allowing applicant to represent the PBGC *Pro Hac Vice* in the above-captioned case.

In support of its Motion, applicant respectfully certifies:

Mr. Ginsberg is an attorney at the PBGC and is a member in good standing of the bar of the District of Columbia. There are no disciplinary proceedings pending against Mr. Ginsberg in any bar in any jurisdiction.

Respectfully submitted,

Dated: November 7, 2006

/s/ John H. Ginsberg \_\_\_\_\_  
JEFFREY B. COHEN  
Chief Counsel  
KARTAR S. KHALSA  
Assistant Chief Counsel  
JOHN H. GINSBERG (D.C. Bar No. 479337)  
Attorney  
PENSION BENEFIT GUARANTY CORP.  
Office of the Chief Counsel  
1200 K Street, NW, Suite 340  
Washington, D.C. 20005-4026  
(202) 326-4020, ext. 3714 (telephone)  
(202) 326-4112 (facsimile)  
ginsberg.john@pbgc.gov and efile@pbgc.gov

---

<sup>1</sup> The Debtors include: CEP Holdings , LLC, Creative Engineered Polymer Products, LLC and Thermoplastics Acquisition, LLC.