

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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In re : Case Nos. 06-61794, 06-61796  
: and 06-61797  
CEP HOLDINGS, LLC, *et al.*, :  
: Chapter 11  
Debtors. :  
: Honorable Russ Kendig  
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**MOTION FOR ADMISSION**  
**PRO HAC VICE, PURSUANT TO LOCAL RULE 2090-1**

Mark E. Freedlander, Esquire, and the law firm of McGuireWoods LLP, counsel to the Unofficial Committee of Trade Creditors, 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 ("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. The Unofficial Committee of Trade Creditors is a group of six (6) pre-petition trade creditors each of which is a party in interest in these chapter 11 proceedings.

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 Mark E. Freedlander, Esquire, to appear before this Court in all matters related to these chapter 11 proceedings.

5. Mark E. Freedlander, Esquire, a partner of the firm McGuireWoods LLP, located at 625 Liberty Avenue, Dominion Tower, 23<sup>rd</sup> Floor, Pittsburgh, Pennsylvania 15222, is a member in good standing of the Bar of the Commonwealth of Pennsylvania and is admitted to practice before the United States District Court for the Western District of Pennsylvania, the United States District Court for the Eastern District of Michigan and the United States Court of Appeals for the Third Circuit.

WHEREFORE, the undersigned respectfully requests admission before this Honorable Court *pro hac vice* to represent the interests of the Unofficial Committee of Trade Creditors in the above-captioned bankruptcy proceedings.

Dated: September 21, 2006

Respectfully submitted,

/s/ Mark E. Freedlander

Mark E. Freedlander

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