

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

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

**MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 2090-1, Gennice D. Brickhouse, 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. The grounds for this Motion are set forth in the Memorandum in Support.

Respectfully submitted,

Dated: February 21, 2007  
Washington, D.C.

/s/ Gennice D. Brickhouse  
\_\_\_\_\_  
ISRAEL GOLDOWITZ  
Chief Counsel  
KAREN L. MORRIS  
Associate Chief Counsel  
KARTAR S. KHALSA  
Assistant Chief Counsel  
GENNICE D. BRICKHOUSE (DC Bar  
No. 419792)  
Attorney

PENSION BENEFIT GUARANTY CORP.  
Office of the Chief Counsel  
1200 K Street, NW, 3<sup>rd</sup> Floor  
Washington, DC 20005-4026  
Tel. No.: (202) 326-4020, ext. 3446  
Fax No.: (202) 326-4112  
E-mails: brickhouse.gennice@pbgc.gov and  
efile@pbgc.gov

---

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