

**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> , ¹)	(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, Gennice D. Brickhouse, on behalf of the Pension Benefit Guaranty Corporation (“PBGC”), 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:

Ms. Brickhouse is an attorney at the PBGC and is a member in good standing of the bar of

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

the District of Columbia. There are no disciplinary proceedings pending against Ms. Brickhouse in any bar in any jurisdiction.

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)
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