

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In Re:

Chapter 11

**CEP HOLDINGS, LLC, *et al.*,**<sup>1</sup>

Case No. 06-61796  
(Joint Administration Pending)

Debtors.

---

Hon. Russ Kendig

**MOTION FOR ADMISSION PRO HAC VICE**

Applicant Sarah Hiltz Seewer of Honigman Miller Schwartz and Cohn LLP respectfully requests permission to appear and participate pro hac vice on behalf of General Motors Corporation in the above referenced case pursuant to LBR Rule 2090-1 and in support of this Motion for Admission Pro Hac Vice certifies and represents to the Court as follows:

1. Ms. Seewer is an attorney with the law firm of Honigman Miller Schwartz and Cohn LLP with her business address at 2290 First National Building, 660 Woodward Avenue, Detroit, Michigan 48226, telephone number 313-465-7592.

2. Ms. Seewer states that she is a member in good standing of the State Bar of Michigan and neither resides nor maintains an office for the practice of law within the State of Ohio. Ms. Seewer states that she has been admitted to practice before the following courts:

a. The United States District and Bankruptcy Courts of the Eastern District of Michigan since 2002; and

c. The United States District and Bankruptcy Courts of the Western District of Michigan since 2004.

---

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

3. Ms. Seewer has never been the subject of a disciplinary hearing.

WHEREFORE, Applicant requests that this Court grant permission to appear in the above-captioned case and enter its Order Approving Admission Pro Hac Vice in the form attached as Exhibit A.

Respectfully submitted,

Honigman Miller Schwartz and Cohn LLP  
Attorneys for General Motors Corporation

Dated: September 22, 2006

By:  /s/ Sarah Hiltz Seewer  
Sarah Hiltz Seewer (MI P64882)  
2290 First National Building  
660 Woodward Avenue  
Detroit, MI 48226  
Telephone: (313) 465-7592  
Facsimile: (313) 465-7593  
Email: sseewer@honigman.com

DETROIT.2324696.1

# **EXHIBIT A**

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

In Re:

Chapter 11

**CEP HOLDINGS, LLC, et al.,<sup>1</sup>**

Case No. 06-61796  
(Joint Administration Pending)

Debtors.

Hon. Russ Kendig

**ORDER APPROVING ADMISSION PRO HAC VICE**

Upon the Motion for Admission Pro Hac Vice of Sarah Hiltz Seewer (“Applicant”) of Honigman Miller Schwartz and Cohn LLP to be admitted pro hac vice as counsel for General Motors Corporation pursuant to LBR 2090-1 and based upon the matters presented and it appearing from the record that good cause exists to grant such application:

IT IS ORDERED that the Motion is granted and the Applicant is hereby admitted to appear before this Court to represent General Motors Corporation in the above captioned case pro hac vice.

Dated: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

DETROIT.2324885.1

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