

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MOTORS LIQUIDATION COMPANY,
f/k/a GENERAL MOTORS CORP., et al.,

Debtors,

KELLY CASTILLO, NICHOLE BROWN,
BRENDA ALEXIS DIGIANDOMENICO,
VALERIE EVANS, BARBARA ALLEN,
STANLEY OZAROWSKI, and DONNA
SANTI,

Plaintiffs,

v.

GENERAL MOTORS COMPANY, f/k/a NEW
GENERAL MOTORS COMPANY, INC.,

Defendant.

Chapter 11

09-50026 (REG)

Jointly Administered

Adv. Proc. No. 09-00509

MOTION FOR ADMISSION TO PRACTICE *Pro Hac Vice*

I, Robert W. Schmieder II, a member in good standing of the bar in the State of Missouri and Illinois and, the bar of the U.S. District Courts for the Eastern District of Missouri, Southern District of Illinois and Central District of Illinois, request admission, *pro hac vice*, before the Honorable Judge Gerber, to represent Plaintiffs in the above-referenced adversary proceeding.

Mailing Address: LakinChapman, LLC
300 Evans Avenue, P.O. Box 229
Wood River, IL 62095

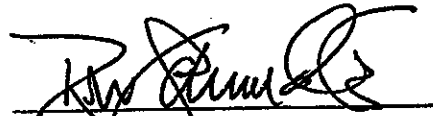
E-Mail Address: robs@lakinchapman.com

Telephone number: (618) 254-1127

I agree to pay the fee of \$25 upon approval by this Court admitting me to practice *pro hac vice*.

Date: November 16, 2009

By:



Robert W. Schmieder II
LAKINCHAPMAN LLC
300 Evans Avenue, P.O. Box 229
Wood River, Illinois 62095-0229
Phone : (618) 254-1127
Fax : (618) 254-0193
E-mail: robs@lakinchapman.com

The Supreme Court of Missouri



*Certificate of Admission as an
Attorney at Law*

I, Thomas F. Simon, Clerk of the Supreme Court of Missouri, do hereby certify that the records of this office show that on October 4, 1996,

Robert W. Schmieder, II

was duly admitted and licensed to practice as an Attorney and Counselor at Law in the Supreme Court of Missouri and all courts of record in this state, and is, on the date indicated below, a member in good standing of this Bar.

IN TESTIMONY WHEREOF, I hereunto set my hand and affix the seal of the Supreme Court of Missouri at my office in Jefferson City, Missouri, this 10th. day of November, 2009.

A handwritten signature in black ink, appearing to read "Thomas F. Simon", written over a horizontal line.

Clerk of the Supreme Court of Missouri

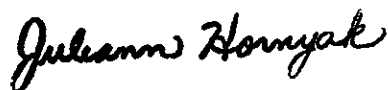
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Robert W Schmieder, II

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on May 8, 1997 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Tuesday, November 10, 2009.



Clerk

EXHIBIT C

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MOTORS LIQUIDATION COMPANY,
f/k/a GENERAL MOTORS CORP., et al.,

Debtors,

KELLY CASTILLO, NICHOLE BROWN,
BRENDA ALEXIS DIGIANDOMENICO,
VALERIE EVANS, BARBARA ALLEN,
STANLEY OZAROWSKI, and DONNA
SANTI,

Plaintiffs,

v.

GENERAL MOTORS COMPANY, f/k/a NEW
GENERAL MOTORS COMPANY, INC.,

Defendant.

Chapter 11

09-50026 (REG)

Jointly Administered

Adv. Proc. No. 09-00509

ORDER

ORDERED,

that Mark Brown, Esq., is admitted to practice, *pro hac vice*, in the above referenced
adversary proceeding, in the United States Bankruptcy Court, Southern District of New York,
subject to payment of the filing fee.

Dated: _____
New York, New York

/s/ _____
United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re MOTORS LIQUIDATION COMPANY,
f/k/a GENERAL MOTORS CORP., et al.,

Debtors,

KELLY CASTILLO, NICHOLE BROWN,
BRENDA ALEXIS DIGIANDOMENICO,
VALERIE EVANS, BARBARA ALLEN,
STANLEY OZAROWSKI, and DONNA
SANTI,

Plaintiffs,

v.

GENERAL MOTORS COMPANY, f/k/a NEW
GENERAL MOTORS COMPANY, INC.,

Defendant.

Chapter 11

09-50026 (REG)

Jointly Administered

Adv. Proc. No. 09-00509

ORDER

ORDERED,

that Robert W. Schmieder II, Esq., is admitted to practice, *pro hac vice*, in the above referenced adversary proceeding, in the United States Bankruptcy Court, Southern District of New York, subject to payment of the filing fee.

Dated: _____
New York, New York

/s/ _____
United States Bankruptcy Judge

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on November 17, 2009, he caused a copy of **MOTION OF PLAINTIFFS FOR ENTRY OF ORDER PURSUANT TO LOCAL R. BANKR. P. 2090-1(B) AUTHORIZING MARK LEE BROWN, ESQ. AND ROBERT W. SCHMIEDER, ESQ. TO PRACTICE PRO HAC VICE** to be served via FedEx overnight upon:

Gregory Oxford, Esq.
Isaacs Clouse Crose & Oxford LLP
21515 Hawthorne Blvd.
Suite 950
Torrence, CA 90503


MICHAEL J. TIFFANY (MT 9367)

RECEIVED

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S. Alyssa Young, Esq. (SY 6105)

Michael J. Tiffany, Esq. (MT 9367)

LEADER & BERKON LLP

630 Third Avenue, 17th Floor

New York, New York 10017

Phone (212) 486-2400

Fax (212) 486-3099

U.S. DISTRICT COURT
S.D.N.Y.

Attorneys for Plaintiffs

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re GENERAL MOTORS CORP., *et al.*,
Debtor,

KELLY CASTILLO, NICHOLE
BROWN, BRENDA ALEXIS
DIGIANDOMENICO, VALERIE
EVANS, BARBARA ALLEN,
STANLEY OZAROWSKI, and
DONNA SANTI, *Individually and on
behalf of all others similarly situated,*

Plaintiffs,

v.

GENERAL MOTORS COMPANY,
f/k/a NEW GENERAL MOTORS
COMPANY, INC.,
Defendant.

Chapter 11 Case No.

09-50026 (REG)

(Jointly Administered)

Adv. Proc. No. 09-00509

**MOTION OF PLAINTIFFS FOR ENTRY OF ORDER PURSUANT TO
LOCAL R. BANKR. P. 2090-1(B) AUTHORIZING MARK LEE BROWN, ESQ. AND
ROBERT W. SCHMIEDER, ESQ. TO PRACTICE *PRO HAC VICE***

Plaintiffs and Class Representatives, Kelly Castillo, Nichole Brown, Brenda
Alexis Digiandomenico, Valerie Evans, Barbara Allen, Stanley Ozarowski, and Donna Santi,
individually and on behalf of all others similarly situated (collectively "Plaintiffs"), respectfully
represent:

1. S. Alyssa Young, Esq., a partner of the law firm of Leader & Berkon LLP, co-counsel for Plaintiffs, and an attorney admitted to practice and in good standing in the Bar of the State of New York and the United States Bankruptcy Court for the Southern District of New York, hereby moves the Court to enter an order permitting Mark Lee Brown, Esq. and Robert W. Schmieder, Esq. to practice *pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to represent the Plaintiffs in the above-referenced adversary proceeding, pursuant to Rule 2090-1(b) of the Local Rules of the Bankruptcy Court for the Southern District of New York (“Local Rules”). Ms. Young is familiar with the facts and circumstances of this case.

2. Mark Lee Brown, Esq. and Robert W. Schmieder, Esq. are attorneys at the law firm of LakinChapman, LLC, located at 300 Evans Avenue, P.O. Box 229, Wood River, IL 62095.

3. LakinChapman, LLC has been retained to represent Plaintiffs as co-counsel in this matter. Mr. Brown and Mr. Schmieder have familiarized themselves with the Local Civil Rules of this Court.

4. Mark Lee Brown, Esq. and Robert W. Schmieder, Esq. are admitted to, and are members in good standing of, the Bar of the State of Missouri and the State of Illinois. Their respective Certificates of Good Standing are attached to each of their affidavits in support of this motion for admission *pro hac vice*.

5. In support of the relief requested in this Motion, attached as Exhibit A is a certificate pursuant to Local Rule 2090-1(b) for Mr. Brown.

6. In support of the relief requested in this Motion, attached as Exhibit A is a certificate pursuant to Local Rule 2090-1(b) for Mr. Schmieder.

7. Movant requests that this Court approve this Motion so that Mr. Brown or Mr. Schmieder may file pleadings and appear and be heard in this adversary proceeding.
(Proposed Orders attached as Exhibit C.)

8. Leader & Berkon LLP will maintain an active role in the defense of this case to insure that the case proceeds with due regard for the laws, procedures, customs, and ethical obligations of this Court.

9. No previous request for the relief sought herein has been made to this or any other Court.

10. Notice of this Motion has been provided to defendant General Motors Company, f/k/a New General Motors Company, Inc.

WHEREFORE the Debtors respectfully request entry of an order granting Mark Lee Brown, Esq. and Robert W. Schmieder, Esq. admission to appear in this case *pro hac vice*.

Dated: November 17, 2009

Respectfully submitted,


By: 
S. Alyssa Young, Esq. (SY 6105)
Michael J. Tiffany, Esq. (MT 9367)
LEADER & BERKON LLP
630 Third Avenue, 17th Floor
New York, New York 10017
Phone (212) 486-2400
Fax (212) 486-3099
Attorneys for Plaintiffs

EXHIBIT A