UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:

Debtors.

Chapter 11 Case No. 12-51502-659 (Jointly Administered)

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

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Pursuant to LR 2090(B)(1) of the United States Bankruptcy Court for the Eastern District of Missouri, and Rule 12.01(F) of the local rules of the United States District Court for the Eastern District of Missouri, I, Rue K. Toland move to be admitted pro hac vice to the bar of this Court for the purpose of representing Irl F. Engelhardt, in the instant matter. In support of this motion, I submit the following information as required by Rule 12.01(F):

a. Full name of the movant-attorney;

Rue K. Toland

b. Address and telephone number of the movant-attorney;

71 South Wacker Chicago, IL 60606 312-701-8975

c. Name of the firm or letterhead under which the movant practices;

Mayer Brown LLP

d. Name of the law school(s) movant attended and the date(s) of graduation therefrom;

Chicago-Kent College of Law, 2010

e. State and federal bars of which the movant is a member, with dates of admission and registration numbers, if any;

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Illinois, No. 6304163, 11/4/2010 U.S. District Court, Northern District of Illinois, No. 6304163, 11/16/11 U.S. District Court, Southern District of Illinois, No. 6304163, 11/24/2012

- f. Rue K. Toland is a member in good standing of all bars of which movant is a member and movant is not under suspension or disbarment from any bar;
- g. Rue K. Toland does not reside in the Eastern District of Missouri, is not regularly employed in this District and is not regularly engaged in the practice of law in this District.

Movant attests under penalty of perjury to the truth and accuracy of the foregoing facts, and respectfully requests that this motion be granted and that movant be admitted pro hac vice to the bar of this Court and be allowed to appear in the instant matter.

April 15, 2013

Respectfully submitted,

CAPES, SOKOL, GOODMAN & SARACHAN, P.C.

By: /s/ S. Todd Hamby S. Todd Hamby, MO40367 7701 Forsyth Boulevard, 12th Floor Saint Louis, Missouri 63105 Telephone: (314) 505-5480 Facsimile: (314) 505-5481 hamby@capessokol.com

/s/ Rue K. Toland Rue K. Toland, IL6304163 Mayer Brown LLP 71 South Wacker Chicago, IL 60606 Telephone: 312-701-8975 Facsimile: 312-706-8153 rtoland@mayerbrown.com

Counsel for Irl F. Engelhardt

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed with the Clerk of Court this 15th day of April, 2013, and was served electronically by operation of the Court's CM/ECF system upon the parties receiving electronic service.

/s/ S. Todd Hamby