

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

[CASE CAPTION])
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MOTION TO APPEAR AS LIOU REPLACEMENT COUNSEL

The undersigned attorney, _____, hereby moves the Court to approve my appearance in this case and to approve fees. In support of this Motion, the undersigned states as follows:

1. Effective August 30, 2013, Timothy K. Liou was permanently suspended from practice before the United States Bankruptcy Court for the Northern District of Illinois.
2. On September 3, 2013, an Order was entered by Hon. Bruce W. Black in case No. 12-90002 establishing the creation of a Current Client Transition Fund (“CCT Fund”) to, among other things, provide funding for replacement counsel in Mr. Liou’s open cases.
3. On September 3, 2013, John F. Hiltz was appointed as the Client Transition Administrator (the “CTA”).
4. Pursuant to the Order Partially Approving the CTA’s Preliminary Plan dated September 20, 2013 (the “Transition Order”), the CTA designated the undersigned to serve as Replacement Counsel for Debtor, and the Debtor has agreed to be represented by the undersigned.
5. As compensation, the undersigned agrees to accept only the remaining disbursements for attorney fees to be made under the Debtors’ Chapter 13 plan in this case and a

claim under the CCT Fund subject to the CTA's Preliminary Plan approved by the Court presiding over Liou's case.

WHEREFORE, the undersigned respectfully requests the Court enter an Order (1) approving my appearance as counsel for the Debtor; (2) authorizing the remaining attorney's fees due under the Debtor's plan to be paid to me; and (3) granting such additional relief as the Court deems just and proper.

Dated: _____

Respectfully Submitted,

[REPLACEMENT COUNSEL]