

GIBBONS P.C.

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Karen A. Giannelli, Esq.
Co-counsel for Keeneland Association

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re	Chapter 11
Zayat Stables,	Case No. 10-13130
Debtor.	Judge Donald H. Steckroth

**APPLICATION FOR ENTRY OF AN ORDER UNDER D.N.J. LBR 2090-1(B)
FOR ADMISSION OF KEVIN G. HENRY, SARAH CHARLES WRIGHT
AND STEPHEN L. BARKER PRO HAC VICE**

Karen Giannelli, pursuant to 28 U.S.C. §1746, certifies:

1. I am a member of the law firm of Gibbons PC and am admitted to practice before this Court.
2. Kevin G. Henry, Sarah Charles Wright and Stephen L. Barker, attorneys at law and partners at Sturgill, Turner, Barker & Moloney, PLLC which maintains offices at 333 W. Vine St., Ste. 1400, Lexington, Kentucky 40507, seek to be admitted *pro hac vice* to practice before this Court as counsel for Keeneland Association, a secured creditor in the captioned chapter 11 bankruptcy case.
3. As set forth in the Certifications of Kevin G. Henry, Sarah Charles Wright and Stephen L. Barker (together, the "Certifications"), filed simultaneously herewith, Messrs. Henry and Barker and Ms. Wright are members in good standing of the bar of the State of Kentucky

and are admitted to practice before the United States District Court for the Eastern District of Kentucky, the United States District Court for the Western District of Kentucky, and the United States Court of Appeals for the Sixth Circuit.

4. At set forth in the Certifications, Mr. Henry, Ms. Wright and Mr. Barker are not under suspension or disbarment by any court. They are not eligible for admission to the Bar of this Court under LBR 2090-1 because they are not attorneys admitted to practice by the Supreme Court of New Jersey, nor are they admitted to practice before the United States District Court for the District of New Jersey.

I certify under penalty of perjury that the foregoing statements made by me are true and correct to the best of my knowledge, information and belief.

Dated: February 24, 2010.

By: /s/ Karen A. Giannelli
Karen Giannelli

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**CERTIFICATION OF SARAH CHARLES WRIGHT
IN SUPPORT OF *PRO HAC VICE* ADMISSION**

Sarah Charles Wright, pursuant to 28 U.S.C. §1746, certifies as follows:

1. I am a partner with the law firm Sturgill, Turner, Barker & Moloney, PLLC which maintains offices at 333 West Vine Street, Suite 1400, Lexington, Kentucky 40507.
2. I am a member in good standing of the bar of the State of Kentucky and am admitted to practice before the United States District Court for the Eastern District of Kentucky, the United States District Court for the Western District of Kentucky, and the United States Court of Appeals for the Sixth Circuit.
3. I have never been suspended or disbarred from the practice of law.
4. I agree to be bound by the rules of this Court upon my admission.

I certify under the penalty of perjury that the foregoing is true and correct to the best of

my knowledge, information and belief.

Dated: February 23, 2010.

By: /s/ Sarah Charles Wright
Sarah Charles Wright

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ORDER FOR ADMISSION *PRO HAC VICE*

The relief set forth on the following pages numbered 2 through 3 is hereby **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed. R. Civ. P.78, D.N.J. L.Civ.R. 101.1 and D.N.J. LBR 2090-1, and good cause having been shown; it is

ORDERED:

1. Sarah Charles Wright is permitted to appear *pro hac vice*; provided that pursuant to D.N.J. L.Civ.R. 101.1(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders.

2. The applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order.

3. The \$150.00 fee required by D.N.J. L. Civ.R. 101(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States Bankruptcy Court for the District of New Jersey at the following address, for forwarding by the Clerk to the District Court:

**United States Bankruptcy Court
District of New Jersey**

Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102
Attention: Pro Hac Vice Admissions

4. The applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey.

5. The Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

CERTIFICATE OF MAILING

I hereby certify that I served a copy of this Order on the applicant and the Treasurer of the New Jersey Lawyers' Fund for Client Protection, Richard J. Hughes Justice Complex, P.O. Box 961, Trenton, NJ 08625-0961 on _____, 2010.