

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
In re:	:	
	:	
	:	Chapter 11 Case No.
FRONTIER AIRLINES	:	
HOLDINGS, INC., et. al.,	:	08-11298 (RDD)
	:	
	:	(Jointly Administered)
Debtors.	:	
	:	
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MOTION FOR ADMISSION TO PRACTICE PRO HAC VICE

Pursuant to Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York, I, Fred Kennon, Assistant County Attorney, request admission, *pro hac vice*, before the Honorable Robert D. Drain, to represent the Doña Ana County Treasurer's Office, a creditor, in the above-numbered and-style cause.

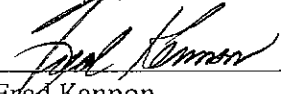
I certify that I am a member in good standing of the bar of the State of New Mexico, bar no. 8282.

I have submitted the filing fee of \$25.00 with this motion for *pro hac vice* admission.

Dated: August 11, 2009

Respectfully submitted,

DOÑA ANA COUNTY ATTORNEY'S OFFICE

By: 
Fred Kennon
New Mexico State Bar No. 8282
845 N. Motel Blvd.
Las Cruces, NM 88007
Telephone: (575) 525-5921
Fax: (575) 525-5925
fkennon@donaanacounty.org
COUNSEL FOR THE DOÑA ANA COUNTY
TREASURER'S OFFICE

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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FRONTIER AIRLINES	:	Chapter 11 Case No.
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	:	
Debtors.	:	(Jointly Administered)
-----X	:	

AFFIRMATION IN SUPPORT OF MOTION TO ADMIT COUNSELF PRO HAC VICE

FRED KENNON, an attorney duly admitted to practice law in the State of New Mexico, hereby affirms as follows under penalty of perjury:

- I am an Assistant County Attorney with the following entity:

Name: Doña Ana County Attorney's Office

Address: 845 N. Motel Blvd.

Las Cruces, New Mexico 88007

Telephone No. (575) 525-5921
- I submit this affirmation in support of my motion for admission to practice pro hac vice in the above-numbered and -styled cause.
- As show in the Certificate of Good Standing attached hereto, I am a member in good standing of the Bar of the State of New Mexico.
- There are no pending disciplinary proceedings against me in any State or Federal court.
- Wherefore, your affirmant respectfully requests that he be permitted to appear as counsel and advocate pro hac vice in this one case.

Date: August 11, 2009

Respectfully submitted,

DOÑA ANA COUNTY ATTORNEY'S OFFICE

By: 

Fred Kennon

New Mexico State Bar No. 8282

845 N. Motel Blvd.

Las Cruces, NM 88007

Telephone: (575) 525-5921

Fax: (575) 525-5925

fkennon@donaanacounty.org

COUNSEL FOR THE DOÑA ANA COUNTY
TREASURER'S OFFICE

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	(Jointly Administered)
Debtors.	:	
	:	
-----	X	

ORDER GRANTING ADMISSION TO PRACTICE PRO HAC VICE

Upon the Motion for Admission, to be admitted, *pro hac vice*, to represent the Doña Ana County Treasurer's Office, a creditor in the above-referenced case, and upon the movant's certification that the movant is a member in good standing of the bar of the State of New Mexico, it is hereby

ORDERED, that Fred Kennon (Bar No. 8282), Assistant County Attorney with the Doña Ana County Attorney's Office, 845 N. Motel Blvd., Las Cruces, New Mexico 88007, is admitted to practice, *pro hac vice*, in the above-referenced case in the United States Bankruptcy Court, Southern District of New York.

Dated: _____, New York

The Honorable Robert D. Drain
UNITED STATES BANKRUPTCY JUDGE

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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Debtors.	:	
	:	
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**NOTICE OF APPEARANCE AND REQUESTING NOTICES AND PAPERS
ON BEHALF OF THE DOÑA ANA COUNTY TREASURER'S OFFICE**

PLEASE TAKE NOTICE that the undersigned hereby appears in the above-captioned cases as counsel for the Doña Ana County Treasurer's Office and pursuant to 11 U.S.C. §§342 and 1109(b) , and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, hereby requests that copies of all notices, applications, motions, petitions, pleadings, orders, filings, and all other mailings and documents in this case from and after this date be given to and served upon the following:

Fred Kennon (fredk@donaanacounty.org)
Doña Ana County Attorney's Office
845 N. Motel Blvd.
Las Cruces, NM 88007
Office: (575) 525-5921
Fax: (575) 525-5925

Neither this Notice nor any subsequent appearance, pleading, claim or suit is intended to confer the jurisdiction of this Bankruptcy Court over the Doña Ana County Treasurer's Office or to waive: (1) any right to have final orders in non-core matters entered only after *de novo* review

by a district judge; (ii) any right to trial by jury in any proceeding so triable herein or in any case, controversy or proceedings related hereto; (iii) any right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which the Doña Ana County Treasurer's Office may be entitled under agreements, at law, or in equity, all of which rights claims, actions, defenses, setoffs and recoupments are hereby expressly reserved.

Respectfully submitted,

By: 

Fred Kennon

Assistant County Attorney

Bar No. 8282

(pro hac vice application pending)

COUNSEL FOR THE DOÑA ANA
COUNTY TREASURER'S OFFICE

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of August, 2009, a true and correct copy of the foregoing Response to Debtor's Fourth Omnibus Objection to the Allowance of Certain Claims on behalf of the Doña Ana County Treasurer's Office was electronically served through the Court's ECF System on parties requesting electronic service and by U.S. Mail, First Class, Postage Prepaid, on the parties shown below.

The Honorable Robert D. Drain
United States Bankruptcy Court for the
Southern District of New York
One Bowling Green
New York, New York 10004

Marshall S. Huebner
Timothy Graulich
Damian S. Schiabile
Hugh R. McCullough
DAVIS POLK & WARDWELL
450 Lexington Avenue
New York, New York 10017

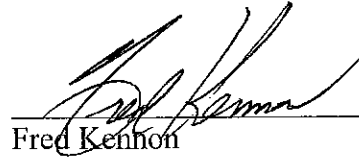
Frontier Airlines Holding, Inc.
Attn: General Counsel
7001 Tower Road
Denver, CO 80249

Andrew Goldman
James H. Millar
WILMER CUTLER PICKERING HALE &
DORR LLP
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Alicia M. Leonard
Office of the United States Trustee
Southern District of New York
33 Whitehall Street, Suite 2100
New York, New York 10004

Frontier Team
Epiq Bankruptcy Solutions, LLC
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New York, New York 10017

Albert Togut
Frank Oswald
D. Person
D. Dawson
K. Ackerman
Togut, Segal, & Segal LLP
One Penn Plaza
New York, New York 10119



Fred Kennon
Assistant County Attorney