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8
9 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
10 **SAN FRANCISCO DIVISION**

11 In re:
12 Heller Ehrman LLP,
13 Debtor

Case No.: 08-32514
Chapter 11

**NOTICE OF MOTION PURSUANT TO
BANKRUPTCY RULE 9019(A) FOR
APPROVAL OF SETTLEMENT AND
COMPROMISE WITH LAWYERS'
COMMITTEE FOR CIVIL RIGHTS**

[No Hearing Date Set]

17 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE;**
18 **THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; THE OFFICE OF THE**
19 **UNITED STATES TRUSTEE; LAWYERS' COMMITTEE FOR CIVIL RIGHTS; AND**
ANY PARTIES ENTITLED TO SPECIAL NOTICE:

20 **NOTICE IS HEREBY GIVEN** that Heller Ehrman LLP, formerly known as Heller
21 Ehrman White & McAuliffe LLP, a California limited liability partnership, the debtor and debtor in
22 possession in the above-captioned case (the "Debtor"), hereby moves the Court (the "Motion") for
23 an order approving the settlement and compromise with Lawyers' Committee for Civil Rights.

24 **PROCEDURE TO BE FOLLOWED**

25 Rule 9014-1 of the United States Bankruptcy Court for the Northern District of California
26 prescribes the procedures to be followed by anyone who requests a hearing on the relief requested
27 in the Objection. Bankr. N.D. Cal. 9014-1. Rule 9014-1(b)(3) requires the following:
28

1 (i) That any objection to the requested relief, or a request for a hearing on the matter,
2 must be filed and served upon the initiating party within twenty (20) days of the mailing of this
3 Notice;

4 (ii) That a request for a hearing or objection must be accompanied by any declarations
5 or memoranda of law the party objecting or requesting wishes to present in support of its position;

6 (iii) That if there is not a timely objection to the requested relief or a request for a
7 hearing, the Court may enter an order granting the relief by default; and

8 (iv) That the initiating party will give at least ten (10) days' written notice of the hearing
9 to the objecting or requesting party, and to any trustee or committee appointed in the case, in the
10 event an objection or request for a hearing is timely made.

11 **NOTICE IS HEREBY FURTHER GIVEN** that the Motion is based on the supporting
12 Memorandum of Points & Authorities, any exhibits attached thereto, and the Declaration of Kyle
13 Everett, and any exhibits attached thereto.

14 Dated: February 4, 2010

PACHULSKI STANG ZIEHL & JONES LLP

15 By /s/ John D. Fiero

16 John D. Fiero
17 Celine M. Guillou

18 Attorneys for Heller Ehrman LLP,
19 Debtor and Debtor in Possession