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*Counsel for KDN Investments, LLC and Melvin D.
Small and Sarah Small, Trustees of Eagle Drive Trust*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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| _____) | |
| In re:) | Chapter 11 |
|) | |
| QUEBECOR WORLD (USA) INC., <i>et al.</i> ,) | Case No. 08-10152 (JMP) |
|) | (Jointly Administered) |
| Debtors.) | |
| _____) | Hon. James M. Peck |

**MOTION OF NASHVILLE, TENNESSEE AND TAUNTON,
MASSACHUSETTS LANDLORDS FOR ORDER AUTHORIZING
WITHDRAWAL OF APPEARANCE AND REMOVAL FROM SERVICE LIST**

KDN Investments, LLC and Melvin D. Small and Sarah Small, as trustees of Eagle Drive Trust (collectively, the "Landlords"), by and through their counsel, Cohn Whitesell & Goldberg LLP, hereby move this Court, pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules, for an order authorizing the withdrawal of the appearance of the undersigned counsel. In addition, the Landlords also request an order directing the debtors' claims agent to remove the Landlords' counsel from the service list maintained pursuant to the case management order entered in this case (the "Case Management Order").¹ In support hereof, the Landlords state as follows:

¹ Final Order (I) Establishing Case Management Procedures for: (A) Omnibus Hearing Dates and (B) Certain Notice, Case Management, and Administrative Procedures dated February 21, 2008 [Docket No. 268].

1. Counsel to the Landlords sought² and obtained³ admission to practice *pro hac vice* in order to file and be heard on two motions of the Landlords concerning two leases under which certain of the debtors (the "Debtor Tenants") were lessees and the Landlords were lessors (the "Landlords' Motions").⁴

2. On July 2, 2008, this Court entered an order which resolved, *inter alia*, the Landlords' Motions by providing for the assumption by the Debtor Tenants of the Leases, as extended and otherwise amended.⁵ Since the Landlords' Motions have been resolved, and the Debtor Tenants have assumed the leases, the Landlords' active participation in these cases is unnecessary and they would like to avoid the expense of their counsel continuing to receive pleadings in the case.

3. Notwithstanding the withdrawal of appearance by the undersigned counsel, if it should become necessary for the Debtor or any other party in interest to provide notice to the Landlords in this case (for example, if a bar date were to be established for administrative expense claims or if a pleading were to be filed seeking relief against the Landlords), the Landlords hereby consent to notice being provided to them through the undersigned counsel; indeed, they request that notice be provided to them by this means.

WHEREFORE, the Landlords request that this Court enter an order, substantially in the form attached hereto, authorizing the withdrawal of the undersigned, and directing the debtors'

² Docket Nos. 471 and 472.

³ Docket Nos. 603 and 604.

⁴ Landlords' Motion to Compel Debtors to Assume or Reject Purchase Agreements Relating to Real Estate in Nashville, Tennessee and Taunton, Massachusetts [Docket No. 472] and Landlord's Motion to Compel Debtor to Perform Postpetition Obligations Under Nashville, Tennessee Lease [Docket No. 475].

⁵ Order Pursuant to 11 U.S.C. §§ 105(a), 362, 363 and 365 and Federal Rules of Bankruptcy Procedure 6004, 6006 and 9019 to (I) Assume, as Amended, (A) an Unexpired Lease of Non-Residential Real Property Located in Nashville, Tennessee and (B) an Unexpired Lease of Non-Residential Real Property Located in Taunton, Massachusetts, (II) Amend (A) Unexpired Lease of Non-Residential Real Property Located in Nashville, Tennessee and (B) Unexpired Lease of Non-Residential Real Property Located in Taunton, Massachusetts and (III) Enter into a

claims agent to remove the undersigned from the general service list maintained pursuant to the Case Management Order.

Respectfully submitted, this 16th day of July, 2008.

KDN INVESTMENTS, LLC, and
MELVIN D. SMALL AND SARAH SMALL,
TRUSTEES OF EAGLE DRIVE TRUST,

By their attorneys,

/s/ Nathan R. Soucy

Daniel C. Cohn (*pro hac vice*)

Nathan R. Soucy (*pro hac vice*)

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**ORDER AUTHORIZING WITHDRAWAL OF APPEARANCE AND
REMOVAL FROM SERVICE LIST OF COUNSEL TO NASHVILLE,
TENNESSEE AND TAUNTON, MASSACHUSETTS LANDLORDS**

Upon the Motion of Nashville, Tennessee and Taunton, Massachusetts Landlords for Order Authorizing Withdrawal of Appearance and Removal from Service List, and there being good and sufficient cause therefor;

IT IS HEREBY ORDERED that

1. The appearance of Daniel C. Cohn, Esq. and Nathan R. Soucy, Esq. as counsel to KDN Investments, LLC and Melvin D. Small and Sarah Small, Trustees of Eagle Drive Trust is hereby withdrawn; and
2. The debtors' claims agent is directed to remove Mr. Cohn and Mr. Soucy from the general service list maintained in this case.

New York, New York
_____, 2008

Hon. James M. Peck
United States Bankruptcy Judge