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10 **UNITED STATES BANKRUPTCY COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 In re
14 **HELLER EHRMAN LLP,**
15 Debtor.

Case No. 08-32514

Chapter 11

**NOTICE OF MOTION FOR RELIEF
FROM DISCOVERY ORDER**

Date: April 22, 2010

Time: 1:30 P.M.

Place: United States Bankruptcy Court
235 Pine Street, 22nd Floor
San Francisco, CA 94104

Judge: Honorable Dennis Montali


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PLEASE TAKE NOTICE that, on April 22, 2010 at 1:30 P.M., or as soon thereafter as this matter shall be heard, in the Courtroom of the Honorable Dennis Montali, United States Bankruptcy Court for the Northern District of California, San Francisco Division, 35 Pine Street, 22nd Floor, San Francisco, CA 94104, Covington & Burling LLP ("Covington") will and hereby does move the Court (the "Motion") for relief from this Court's order entered on February 5, 2010 [Docket No. 906], which granted the Debtor's *Ex Parte Application Pursuant To Bankruptcy Rule 2004 For Order Authorizing Examination Of Witnesses And Production Of Documents* (the "2004 Application") [Docket No. 901]. In addition, Covington seeks leave to make this request to the extent it may be inconsistent with anything contained in the *Stipulation Preserving Rights With Respect To Discovery Served Pursuant to Federal Rule of Bankruptcy Procedure 2004* (the "2004 Stipulation") [Docket No. 948] and its attendant order entered on March 1, 2010 [Docket No. 963].

The Motion is made pursuant to Rule 60(b)(6) of the Federal Rules of Civil Procedure, made applicable to this proceeding by Rule 9024 of the Federal Rules of Bankruptcy Procedure. The Motion is based upon the facts and legal arguments set forth in the accompanying Memorandum of Points and Authorities and Declaration of Mark B. Helm, all other pleadings and papers on file in this matter, and on such oral argument of counsel, or evidence, as may be presented at the hearing on the Motion.

DATED: March 24, 2010

MUNGER, TOLLES & OLSON LLP
Mark B. Helm
Richard St. John
Todd J. Rosen

By: 
Mark B. Helm

Attorneys for Covington & Burling LLP