

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION

In re:

BK Entertainment, Inc., and its  
subsidiaries, Bingo Systems & Supplies, Inc.,  
Western Bingo Supplies, Inc. and  
Video King Gaming Systems, Inc.,

Debtors.

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Bky 01-40638 to Bky 01-40641  
Chapter 11 Bankruptcy  
Jointly Administered

BK Entertainment, Inc.,

Plaintiff,

v.

Grupo Pipsamex, S.A.,

Defendant.

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Adv. No. 02-4234

**AMENDED NOTICE OF HEARING AND  
MOTION TO WITHDRAW AS COUNSEL FOR GRUPO PIPSAMEX, S.A.**

1. White & Case, LLP (“White & Case”) and Gray, Plant, Mooty, Mooty & Bennett, P.A. (“Gray Plant Mooty”) hereby files their Motion to Withdraw as Counsel for Grupo Pipsamex, S.A. de C.V. (the “Motion”).

2. The Court will hold a hearing on this Motion at **10:30 a .m. on October 27, 2004**, or as soon thereafter as counsel can be heard, before the Honorable Nancy Dreher, Courtroom 7W at the U.S. Bankruptcy Court, U.S. Courthouse, 300 South Fourth Street, Minneapolis, Minnesota 55415.

3. Any response to this motion must be filed and delivered **not later than Friday, October 22, 2004**, which is three days before the time set for the hearing (excluding Saturdays,

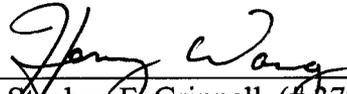
Sundays, and holidays), or filed and served by mail **not later than Monday, October 18, 2004**, which is seven days before the time set for hearing (excluding Saturdays, Sundays, and holidays). **UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.**

4. The Motion arises under Rules 12(b) and 4(h) and (f) of the Federal Rules of Civil Procedure (the "Federal Rules") as incorporated by the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). Pursuant to Local Rule 9010-3, hereby file their motion to withdraw as counsel for Grupo Pipsamex, S.A. de C.V. ("Grupo Pipsamex"), and in support state as follows:

Grupo Pipsamex has requested that White & Case and Gray Plant Mooty withdraw as its counsel in the above captioned adversary case (the "Case"). Furthermore, Grupo Pipsamex has instructed White & Case and Gray Plant Mooty to cease all activities on its behalf in connection with this Case. The Declaration of Gabriel Villegas Salazar, Corporate Legal Director for Grupo Pipsamex, confirming these instructions is attached as **Exhibit A**.

WHEREFORE, undersigned counsel request the entry of an order allowing White & Case and Gray Plant to withdraw as counsel for Grupo Pipsamex in this Case.

Respectfully submitted on September 21, 2004,

By:   
Stephen F. Grinnell (#37928)  
Henry T. Wang (# 033022X)  
500 IDS Center  
80 South Eighth Street  
Minneapolis, Minnesota 55402  
Telephone: (612) 632-3370  
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-and-

John K. Cunningham  
Linda Leali  
WHITE & CASE LLP  
Attorneys for Defendant  
4900 Wachovia Financial Center  
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Miami, Florida 33131-2352  
Telephone: (305) 371-2700  
Facsimile: (305) 358-5744

GP:1622365 v2

**DECLARATION OF GABRIEL VILLEGAS SALAZAR**

CITY OF MÉXICO )

FEDERAL DISTRICT OF MEXICO )

1. I am over the age of eighteen and am competent to testify as to the matters set forth herein. I have personal knowledge of the matters set forth herein, except as otherwise indicated. I am Corporate Legal Director of Grupo Pipsamex, S.A. de C.V. ("Grupo Pipsamex").

2. As Corporate Legal Director of Grupo Pipsamex, I have determined that Grupo Pipsamex does not require the services of outside counsel in the adversary case styled B.K. Entertainment, Inc. v. Grupo Pipsamex, S.A., Adv. O. 02-4234 (the "Case"). Accordingly, I have requested that White & Case LLP and Gray, Plant, Mooty, Mooty & Bennett, P.A. withdraw as counsel for Grupo Pipsamex in the Case.

3. I have further instructed White & Case LLP and Gray, Plant, Mooty, Mooty & Bennett, P.A. to immediately cease all activity in defense of Grupo Pipsamex in this Case.

4. Communications to Grupo Pipsamex may be directed to my attention, as follows:

Lic. Gabriel Villegas Salazar  
Grupo Pipsamex S.A. de C.V.  
C/O Corporación Durango S.A. de C.V.  
Montecito No. 38, Piso 22, Oficina 15  
03810 México, D.F.  
telephone: 52-55-5488-03-80  
facsimile: 52-55-5488-31-53

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



**Exhibit A**

Executed this \_\_\_ day of August, 2004.

  
/s/ Gabriel Villegas

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re:

BK Entertainment, Inc., and its  
subsidiaries, Bingo Systems & Supplies, Inc., 40641  
Western Bingo Supplies, Inc. and  
Video King Gaming Systems, Inc.,  
Debtors.

Bky 01-40638 to Bky 01-  
Chapter 11 Bankruptcy  
Jointly Administered

BK Entertainment, Inc.,  
Plaintiff,

Adv. No. 02-4234

v.

Grupo Pipsamex, S.A.,  
Defendant.

**UNSWORN CERTIFICATE OF SERVICE**

I, **CHERYL MOLINE**, declare under penalty of perjury that on September 21, 2004, I caused to be served by U.S. mail the following:

1. Amended Notice of Hearing and Motion to Withdraw as Counsel for Grupo Pipsamex, S.A.; and
2. Amended Order Granting Attorneys' Motion to Withdraw as Counsel for Grupo Pipsamex.

upon:

Clinton E. Cutler, Esq.  
Ryan T. Murphy, Esq.  
Fredrikson & Byron, P.A.  
4000 Pillsbury Center  
200 South Sixth Street  
Minneapolis, MN 55402-1425

United States Trustee's Office  
1015 U.S. Courthouse  
300 South 4<sup>th</sup> Street  
Minneapolis, MN 55415

by depositing a true and correct copy thereof in the United States Mail, postage prepaid, in  
Minneapolis, Minnesota

Executed on: September 21, 2004    Signed:

A handwritten signature in cursive script, reading "Cheryl Moline", written over a horizontal line.

Cheryl Moline  
Employed by Gray, Plant, Mooty,  
Mooty & Bennett, P.A.  
500 IDS Center  
80 South 8<sup>th</sup> Street  
Minneapolis, MN 55402

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA  
FOURTH DIVISION

In re:

BK Entertainment, Inc., and its  
subsidiaries, Bingo Systems & Supplies, Inc.,  
Western Bingo Supplies, Inc. and  
Video King Gaming Systems, Inc.,

Bky 01-40638 to Bky 01-40641  
Chapter 11 Bankruptcy  
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BK Entertainment, Inc.,

Adv. No. 02-4234

Plaintiff,

v.

Grupo Pipsamex, S.A.,

Defendant.

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**AMENDED ORDER GRANTING ATTORNEYS' MOTION  
TO WITHDRAW AS COUNSEL FOR GRUPO PIPSAMEX**

This matter came before the Court for hearing on October 27, 2004, at 10:00 a.m. on White & Case LLP and Gray, Plant, Mooty, Mooty & Bennett's Motion to Withdraw as counsel for the defendant, Grupo Pipsamex, S.A. de C.V. (the "Motion"). Appearances were as noted on the record. Having considered the pleadings and heard argument of counsel for the parties, it is hereby

ORDERED as follows:

1. The Motion is GRANTED.
2. White & Case LLP and Gray, Plant, Mooty, Mooty & Bennett are removed as counsel for Grupo Pipsamex.

