

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CHRISTIAN A. FELIPE,	)	Case # <u>2:22-CV-01159-RFP-NJK</u>
	)	
Plaintiff(s),	)	<b>VERIFIED PETITION FOR PERMISSION TO PRACTICE IN THIS CASE ONLY BY ATTORNEY NOT ADMITTED TO THE BAR OF THIS COURT AND DESIGNATION OF LOCAL COUNSEL</b>
vs.	)	
PLAYSTUDIOS, INC., et al.,	)	
	)	
Defendant(s).	)	FILING FEE IS \$250.00
_____	)	

Jeremy A. Lieberman, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of  
Pomerantz LLP  
(firm name)

with offices at 600 Third Avenue, Floor 20,  
(street address)  
New York, New York, 10016,  
(city) (state) (zip code)  
212-661-1100, jalieberman@pomlaw.com.  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by  
The Phoenix Insurance Company Ltd. and  
The Phoenix Provident Pension Fund Ltd. to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

3. That since September 17, 2003, Petitioner has been and presently is a  
(date)  
member in good standing of the bar of the highest Court of the State of New York  
(state)  
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
possession of the United States in which the applicant has been admitted to practice law certifying  
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District  
Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
of other States on the dates indicated for each, and that Petitioner is presently a member in good  
standing of the bars of said Courts.

Court	Date Admitted	Bar Number
See Exhibit A attached.		

5. That there are or have been no disciplinary proceedings instituted against petitioner,  
nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
or administrative body, or any resignation or termination in order to avoid disciplinary or  
disbarment proceedings, except as described in detail below:

(State "none" if Petitioner has no disciplinary proceedings, etc.) NONE.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

(State "none" if Petitioner has never been denied admission.) NONE.

7. That Petitioner is a member of good standing in the following Bar Associations.

(State "none" if Petitioner is not a member of other Bar Associations.) NONE.

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
See Exhibit C attached.			

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

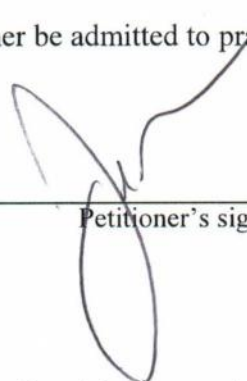
11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.




1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF New York )  
COUNTY OF New York )

  
\_\_\_\_\_  
Petitioner's signature

Jeremy A. Lieberman, Petitioner, being first duly sworn, deposes and says:  
That the foregoing statements are true.

  
\_\_\_\_\_  
Petitioner's signature

Subscribed and sworn to before me this

25<sup>th</sup> day of July, 2022.

  
\_\_\_\_\_  
Notary Public or Clerk of Court

**ELAINE F. GOODMAN**  
Notary Public - State of New York  
Commission No. 01GO6277645  
Qualified in New York County  
My Commission Expires Mar. 11, 2025

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Andrew R. Muehlbauer,  
(name of local counsel)  
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

Muehlbauer Law Office, Ltd., 7915 West Sahara Avenue, Suite 104,  
(street address)

Las Vegas, Nevada, 89117,  
(city) (state) (zip code)

702-330-4505, andrew@mlolegal.com,  
(area code + telephone number) (Email address)



By this designation the petitioner and undersigned party(ies) agree that this designation constitutes agreement and authorization for the designated resident admitted counsel to sign stipulations binding on all of us.

**APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

The undersigned party(ies) appoint(s) Andrew R. Muehlbauer as his/her/their Designated Resident Nevada Counsel in this case.

**Meni Neeman**  
Chief Legal Counsel

Phoenix



L.N. 77882 (party's signature) The Phoenix Insurance Company Ltd. and The Phoenix Provident Pension Fund Ltd.

(type or print party name, title)

(party's signature)

(type or print party name, title)

**CONSENT OF DESIGNEE**

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

*Andrew R. Muehlbauer*

Designated Resident Nevada Counsel's signature

10161

andrew@mlolegal.com

Bar number

Email address

APPROVED:

Dated: this 2nd day of August, 2022.

*[Signature]*

UNITED STATES DISTRICT JUDGE

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHRISTIAN A. FELIPE,

Plaintiff,

v.

PLAYSTUDIOS, INC., et al.

Defendants.

Case No. 2:22-CV-01159-RFB-NJK

**CERTIFICATION OF  
JEREMY A. LIEBERMAN**

1 1. I am an attorney with the law firm of Pomerantz LLP, 600 Third Avenue, 20th Floor,  
2 New York, New York 10016.

3 2. I make this certification pursuant to LR IA 11-2(b)(3).

4 3. I have been a member in good standing of the bars set forth on Exhibit A annexed hereto.

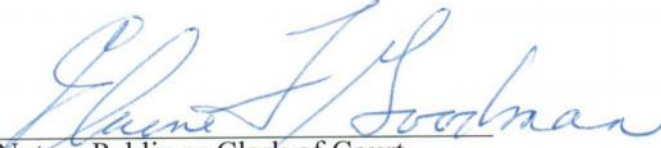
5 4. Attached as Exhibit B is my Certificate of Good Standing to the Supreme Court for the  
6 State of New York, Appellate Division, Second Judicial Department. This is the only state court where I  
7 am admitted. All of my other admissions are to federal courts.

8 5. I am in good standing in every court where I have been admitted to practice.

9 6. There are no disciplinary proceedings pending against me as a member of the Bar in any  
10 jurisdiction where I am admitted to practice.

11  
12  
13   
14 \_\_\_\_\_  
15 Jeremy A. Lieberman

16 Subscribed and sworn to before me this 25<sup>th</sup> day of July, 2022.

17  
18   
19 \_\_\_\_\_  
20 Notary Public or Clerk of Court

21 **ELAINE F. GOODMAN**  
22 **Notary Public - State of New York**  
23 **Commission No. 01GO6277645**  
24 **Qualified in New York County**  
25 **My Commission Expires Mar. 11, 2025**

# Exhibit A



**Exhibit A - Jeremy A. Lieberman Court Admissions**

<b><u>Court</u></b>	<b><u>Date Admitted</u></b>	<b><u>Bar Number</u></b>
Supreme Court, State of New York, Second Department	Wednesday, September 17, 2003	4161352
United States District Court, Southern District of New York	Tuesday, January 10, 2006	JL 6130
United States District Court, Eastern District of New York	Tuesday, January 10, 2006	JL1173
United States Court of Appeals for the Second Circuit	Monday, November 09, 2009 (admitted); Wednesday, October 29, 2014 (renewed); Wednesday, September 11, 2019 (renewed)	09-201182
United States Court of Appeals for the Ninth Circuit	Thursday, March 3, 2011	No such number assigned.
United States District Court, Northern District of Illinois	Friday, August 31, 2012	4161352
United States District Court, Southern District of Texas	Tuesday, November 26, 2013	No such number assigned.
United States Court of Appeals for the Third Circuit	Friday, January 31, 2014	No such number assigned.
United States Court of Appeals for the Tenth Circuit	Wednesday, March 5, 2014	No such number assigned.

**Exhibit A - Jeremy A. Lieberman Court Admissions**

<b><u>Court</u></b>	<b><u>Date Admitted</u></b>	<b><u>Bar Number</u></b>
United States District Court, District of Colorado	Friday, June 13, 2014 (admitted); Tuesday, September 29, 2020 (renewed)	No such number assigned.
United States District Court, Eastern District of Michigan	Thursday, June 19, 2014	No such number assigned.
United States Court of Appeals for the Sixth Circuit	Friday, January 30, 2015	No such number assigned.
United States Court of Appeals for the Fourth Circuit	Thursday, June 11, 2015	No such number assigned.
United States Court of Appeals for the Eleventh Circuit	Wednesday, April 6, 2016	No such number assigned.
Supreme Court of the United States	Monday, November 27, 2017	303778
United States District Court, Northern District of New York	Tuesday, March 26, 2019	700864
United States Court of Appeals for the First Circuit	Thursday, June 13, 2019	1173466
United States District Court, Western District of New York	Thursday, September 26, 2019	No such number assigned.
United States Court of Appeals for the Fifth Circuit	Tuesday, October 6, 2020	No such number assigned.

**Exhibit A - Jeremy A. Lieberman Court Admissions**

<b><u>Court</u></b>	<b><u>Date Admitted</u></b>	<b><u>Bar Number</u></b>
United States District Court, Eastern District of Wisconsin	Tuesday, November 30, 2021	No such number assigned.

# Exhibit B





*Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department*

---

*I, Maria T. Fasulo, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that*

*Jeremy Alan Lieberman*

*was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **September 17, 2003**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.*

*In Witness Whereof, I have hereunto set  
my hand in the City of Brooklyn on  
June 30, 2022.*



*Maria T. Fasulo*

*Clerk of the Court*

# Exhibit C

Exhibit C - Jeremy A. Lieberman Pro Hac Vice Admissions

Date of Application	Cause	Title of Court, Administrative Body, or Arbitrator	Was Application Granted or Denied?
August 16, 2020	Costas v. Ormat Technologies Inc., et al., Case No. 3:2018-cv-00271 (D. Nev.)	U.S. District Court, District of Nevada	Granted
April 13, 2020	Chase v. Paysign, Inc., et al., Case No. 2:2020-cv-00585 (D. Nev.)	U.S. District Court, District of Nevada	Granted
November 5, 2020	The Daniels Family 2001 Revocable Trust v. Las Vegas Sands Corp., et al., Case No. 2:2020-cv-01958 (D. Nev.)	U.S. District Court, District of Nevada	Granted
January 27, 2021	Shi v. Paysign, Inc. et al., Case No. 2:2020-cv-00553 (D. Nev.)	U.S. District Court, District of Nevada	Granted
December 29, 2021	Schlatre v. Marathon Digital Holdings, Inc., et al., Case No. 2:2021-cv-02209 (D. Nev.)	U.S. District Court, District of Nevada	Granted
September 15, 2021	Luo v. Spectrum Pharmaceuticals, Inc., et al. Case No. 2:2021-cv-01612 (D. Nev.)	U.S. District Court, District of Nevada	Granted