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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILLIAM A. BATCHELOR)
Plaintiff(s),)
vs.)
YORK HOLDING, LTD; CHANGQING)
LIU; RAYFORD INTERNATIONAL)
INC.; FREDRICK WAID; GREENLAKE)
REAL ESTATE FUND LLC; DOE)
INDIVIDUALS I-X; and ROE)
CORPORATIONS I-X, inclusive,)
Defendant(s).)

Case # 2:24-cv-00239

**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**

FILING FEE IS \$250.00

Erica A. Wolff, 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
Sher Tremonte LLP

(firm name)

with offices at _____, 90 Broad Street, 23rd Floor
(street address)

_____, _____, _____
New York New York 10004
(city) (state) (zip code)

_____, _____
2122022600 ewolff@shertremonte.com
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
Changqing Liu to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

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3. That since June 28, 2010, 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
New York State Supreme Court, Appellate Divisio	June 28, 2010	4846424
Southern District of New York	May 29, 2012	EW0221
Eastern District of New York	Oct. 10, 2013	
US Court of Appeals, 2nd Circuit	Sept. 24, 2013	
Western District of New York	Nov. 21, 2023	

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:

None.

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

None.

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

Federal Bar Council

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
None.			

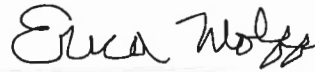
(If necessary, please attach a statement of additional applications)

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

3 

4 _____
Petitioner's signature

5 STATE OF Nevada)
6 COUNTY OF Clark)

7 Erica A. Wolff, Petitioner, being first duly sworn, deposes and says:

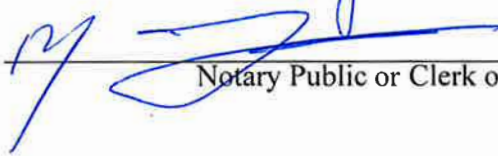
8 That the foregoing statements are true.

9 

10 _____
Petitioner's signature

11 Subscribed and sworn to before me this

12 5th day of February, 2024.

13 

14 _____
Notary Public or Clerk of Court

15 **RAPHAEL A. FRIEDMAN**
16 NOTARY PUBLIC, STATE OF NEW YORK
17 Registration No. 02FR0004513
18 Qualified in New York County
19 Commission Expires March 30, 2027

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

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

28 Littler Mendelson PC, 3960 Howard Hughes Parkway, Suite 3600,
(street address)

Las Vegas,
(city)

Nevada,
(state)

89169,
(zip code)

(702) 862-7742, ekim@littler.com, phicks@littler.com
(area code + telephone number) (Email address)

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

4
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Emil Kim and Patrick Hicks as
8 his/her/their Designated Resident Nevada Counsel in this case.
(name of local counsel)

9
10 

11 _____
(party's signature)

12 Erica A. Wolff

13 _____
(type or print party name, title)

14 _____
(party's signature)

15 _____
(type or print party name, title)

16
17 **CONSENT OF DESIGNEE**

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

19 



20 _____
Designated Resident Nevada Counsel's signature

21 14894

ekim@littler.com

22 Bar number

Email address

4632

phicks@littler.com

23 APPROVED:

24 Dated: this 14 day of February, 2024.

25 
26 _____
27 UNITED STATES DISTRICT JUDGE



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

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

Erica Ashley Wolff

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on June 28, 2010, 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 Office of Court Administration, 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 New York on
January 16, 2024.*



Susanna M. Rojas

Clerk of the Court



Supreme Court of the State of New York
Appellate Division, First Department

DIANNE T. RENWICK
PRESIDING JUSTICE

SUSANNA MOLINA ROJAS
CLERK OF THE COURT

MARGARET SOWAH
DEPUTY CLERK OF THE COURT

DOUGLAS C. SULLIVAN
DEPUTY CLERK OF THE COURT

To Whom It May Concern

An attorney admitted to practice by this Court may request a certificate of good standing, which is the only official document this Court issues certifying to an attorney's admission and good standing.

An attorney's registration status, date of admission and disciplinary history may be viewed through the attorney search feature on [the website of the Unified Court System](#).

New York State does not register attorneys as active or inactive.

An attorney may request a disciplinary history letter from the [Attorney Grievance Committee of the First Judicial Department](#).

Bar examination history is available from the [New York State Board of Law Examiners](#).

Instructions, forms and links are available on [this Court's website](#).

Susanna Rojas
Clerk of the Court

Revised October 2020

**United States District Court
Southern District of New York**

Certificate of Good Standing

I, *Ruby J. Krajick*, Clerk of Court, Certify that

ERICA ASHLEY WOLFF, Bar # EW0221

was duly admitted to practice in the Court on

May 29, 2012

and is in good standing as a member of the Bar of this Court

Dated at

500 Pearl St.
New York, New York

On

October 25, 2023



Ruby J. Krajick
Clerk of Court

By

s/ V. Adolphe
Deputy Clerk