Cotton Bayou Marina, Inc. v. BP, PLC et al Doc. 23

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

COTTON BAYOU MARINA, INC. d/b/a TACKY JACK'S RESTAURANT, individually and on behalf of themselves and all others similarly situated,	)	
Plaintiffs,	)	
vs.	)	Civil Action No. 1:10-cv-00243-C
BP, plc, et al.,	)	
Defendants.	)	

MOTION TO ADMIT ATTORNEY *PRO HAC VICE*

COMES NOW the undersigned, Joseph P. H. Babington, a member in good standing of the Bar of the State of Alabama and of the United States District Court for the Southern District of Alabama, and an attorney of record for Defendant, Halliburton Energy Services, Inc. ("HESI"), and respectfully moves for the admission *pro hac vice* of attorney JENNY L. MARTINEZ of the firm Godwin Ronquillo PC, as additional counsel for HESI. In support of this Motion, an executed Application for Admission to Practice and Certificate of Good Standing are attached hereto.

With the filing of this motion, the undersigned is submitting to the Clerk of this Court the appropriate fee of $50 pursuant to Rule 83.5 of the Rules of the United States District Court for the Southern District of Alabama.

WHEREFORE, the undersigned respectfully requests that this Court grant the Motion and admit Jenny L. Martinez of the firm Godwin Ronquillo PC *pro hac vice* as additional counsel for HESI.

Dockets.Justia.com

Respectfully submitted this 25th day of May, 2010.

GODWIN RONQUILLO PC

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ATTORNEYS FOR DEFENDANT, HALLIBURTON ENERGY SERVICES, INC.

CERTIFICATE OF SERVICE

I hereby certify that I have on this 25th day of May, 2010, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the court's electronic filing system. I also certify that I have mailed this filing by United States Postal Service to all counsel of record who are not registered to receive electronic service by operation of the court's electronic filing system.

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s/ Joseph P. H. Babington
Of counsel

APPLICATION FOR ADMISSION TO PRACTICE

The undersigned attorney hereby applies for admission to practice before the United States District Court for the Southern District of Alabama (check one) _____ Generally, or ___✓___ *Pro Hac Vice* and submits the following:

1. **State:**

   (a) Full name: Jenny Lanell Jones Martinez

   (b) Present business address: 1201 Elm Street, Suite 1700, Dallas, Texas 75270

   (c) Office telephone number and fax number: 214-939-4620, 214-760-7332

   (d) Name of your firm, company or agency: Godwin Ronquillo PC

   (e) Last four digits of social security number: 2941

2. **State the law school(s) you have attended, specifying the dates and the degrees(s) you have received:**
   Southern Methodist University, 1999, J.D.

3. **(a) Are you a member in good standing of the bar of the Supreme Court of Alabama?**
   No.
   (b) If so, state the month and year you were admitted:

   (c) Are you a member in good standing of the bar of any other state's highest court?
   Yes.
   (d) If so, name the state(s) and the month and year you were admitted:
   Texas, November 1999

4. **Name the federal courts, if any, to which you are presently admitted to practice, and are in good standing:**
   See Attached.

5. **Are you regularly engaged in the practice of law in the State of Alabama?**
   No.

6. **(a) Have you ever sought admission to practice before any federal or state appellate or trial court and been refused admission, either on a temporary or permanent basis?**
   No.
   (b) If so, describe fully the circumstances:

7. **(a) Do you presently have pending against you any disciplinary charges by any court or bar association?** No

   (b) If so, describe fully the circumstances:

8. **(a) Have you ever been cited for contempt by any federal or state court ?**
   No.
   (b) If so, describe fully the circumstances:

9. **(a) Have you ever been disbarred or suspended from practice or in any other way disciplined in any federal or state appellate or trial court?**
No.
(b) If so, describe fully the circumstances:

10. **Do you understand the Code of Professional Responsibility of the Alabama State Bar, as amended to date, and do you agree to comport yourself in accordance with it in connection with your practice in this Court?**
Yes.

11. **Do you agree to read and abide by the Local Rules of the United States District Court for the Southern District of Alabama, and to familiarize yourself therewith prior to filing any case and/or pleadings or appearing before this Court, and to familiarize yourself with the Standing Orders of this Court and the Administrative Rules for Electronic Filing?**
Yes.
(The Standing Orders of this Court and Administrative Rules for Electronic Filing are available for your review in the Clerk's Office or on the web at http://www.als.uscourts.gov/.)

12. **I declare under penalty of perjury that the foregoing is true and correct.**

Jenny Martinez
_____
Applicant

Date: 5/21/10

Oath of Admission:

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT I WILL DEMEAN MY SELF AS AN ATTORNEY, ACCORDING TO THE BEST OF MY LEARNING AND ABILITY, AND WITH ALL GOOD FIDELITY, AS WELL TO THE COURT AS TO THE CLIENT; THAT I WILL USE NO FALSEHOOD OR DELAY ANY PERSON'S CAUSE FOR LUCRE OR MALICE, AND THAT I WILL SUPPORT THE CONSTITUTION OF THE STATE OF ALABAMA AND OF THE UNITED STATES, SO LONG AS I CONTINUE A CITIZEN THEREOF, SO HELP ME GOD.

Jenny Martinez
_____
Signature of Attorney

MOTION FOR GENERAL ADMISSION

(Not required for Pro Hac Vice admission)

***The undersigned _____, a member of the bar of the United States District Court for the Southern District of Alabama, hereby moves that the foregoing applicant be admitted to practice as an attorney of this Court this _____ day of _____, 20_____.**

_____
Signature of Movant

***NOTE: MOVANT MUST APPEAR WITH APPLICANT AT TIME OF ADMISSION.**

Jenny L. Martinez

4. Bar Memberships

Northern District of Texas
Southern District of Texas
Eastern District of Texas
Western District of Texas
Northern District of Florida

Certificate of Good Standing

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

I, ***KAREN MITCHELL****, Clerk of the United States District Court, Northern District of Texas, DO HEREBY CERTIFY that* ***Jenny L. Martinez****, Bar #* ***24013109****, was duly admitted to practice in said Court on* ***02/27/01****, and is in good standing as a member of the bar of said Court.*

Signed at ***Dallas****, Texas on 05/04/10 .*

Karen Mitchell

BY: Dawn D. Burton

Deputy Clerk