

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS  
WESTERN DIVISION**

**ROBERT STEINBUCH,** )  
 )  
**Movant,** )  
 )  
**JESSICA CUTLER,** )  
 )  
**Respondent** )

**Case No. 4:06-mc-0028-JMM**

**MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Beth M. Deere, a member of the Bar of this Court, pursuant to Local Rule 83.5(d) of the Rules of the United States District Court for the Eastern and Western Districts of Arkansas, moves that Matthew C. Billips, a member of the firm of Miller & Billips, P.C., 730 Peachtree Street, Suite 750, Atlanta Georgia, 30308, be permitted to appear and participate in this action as counsel for respondent, Jessica Cutler. An affidavit demonstrating satisfaction of Local Rule 83.5(d)'s criteria for a special or limited appearance with respect to Mr. Billips is attached hereto and made a part hereof as Exhibit "A."

Beth Deere maintains an office in Arkansas for the practice of law at the address and telephone number set forth below, and, in accordance with Local Rule 83.5(d), is designated as the attorney with whom the Court and opposing counsel may readily communicate regarding the conduct of the case.

WHEREFORE, premises considered, Respondent prays for an Order granting this motion and for all proper relief.

WILLIAMS & ANDERSON PLC  
111 Center Street  
Twenty-Second Floor  
Little Rock, Arkansas 72201  
(501) 372-0800  
(501) 372-6453 (facsimile)  
[bdeere@williamsanderson.com](mailto:bdeere@williamsanderson.com)

By: /s/ Beth Deere  
Beth M. Deere, Bar No. #86050

*Local Counsel for Jessica Cutler*

**CERTIFICATE OF SERVICE**

On this 25<sup>th</sup> day of September, 2006, I hereby certify that a copy of the foregoing is being served via the Court's CM/ECF System to the following counsel of record as follows:

Jonathan Rosen, Esquire  
1645 Lamington Road  
Bedminster, NJ 07921  
[xjonathan@mac.com](mailto:xjonathan@mac.com)

Matthew C. Billips  
MILLER & BILLIPS, LLC  
730 Peachtree Street, Suite 750  
Atlanta, GA 30308  
[mwillips@mbalawfirm.com](mailto:mwillips@mbalawfirm.com)

/s/ Beth Deere  
Beth Deere