

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Sarah Andersen, an individual;
Kelly McKernan, an individual;
Karla Ortiz, an individual,

Plaintiff(s),

v.

Stability AI, LTD., a UK corporation; Stability AI, Inc.,
a Delaware corporation; MIDJOURNEY, INC., a Delaware
corporation; DEVIANTART, INC., a Delaware corporation,

Defendant(s).

Case No. 23-cv-00201-JCS

**APPLICATION FOR ADMISSION OF
ATTORNEY PRO HAC VICE
(CIVIL LOCAL RULE 11-3)**

United States District Court
Northern District of California

I, Michael C. Keats, an active member in good standing of the bar of
Southern District of New York, hereby respectfully apply for admission to practice pro hac
vice in the Northern District of California representing: Defendant Stability AI, Inc.* in the
above-entitled action. My local co-counsel in this case is Mark A. Lemley, an
attorney who is a member of the bar of this Court in good standing and who maintains an office
within the State of California. Local co-counsel's bar number is: 155830.

One New York Plaza, New York, NY 10004

MY ADDRESS OF RECORD

(212) 859-8000

MY TELEPHONE # OF RECORD

michael.keats@friedfrank.com

MY EMAIL ADDRESS OF RECORD

745 Fifth Avenue, Ste. 500, New York, NY 10151

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

(646) 898-2055

LOCAL CO-COUNSEL'S TELEPHONE # OF RECORD

mlemley@lex-lumina.com

LOCAL CO-COUNSEL'S EMAIL ADDRESS OF RECORD

I am an active member in good standing of a United States Court or of the highest court of
another State or the District of Columbia, as indicated above; my bar number is: MK2342.

A true and correct copy of a certificate of good standing or equivalent official document
from said bar is attached to this application.

I have been granted pro hac vice admission by the Court 0 times in the 12 months
preceding this application.

* Counsel's appearance does not constitute consent to this Court's exercise of personal jurisdiction over Defendant, and is subject to and without
waiver of Defendant's right to dispute such exercise of jurisdiction and/or to otherwise seek to dismiss or transfer this action.

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I agree to familiarize myself with, and abide by, the Local Rules of this Court, especially the Standards of Professional Conduct for attorneys and the Alternative Dispute Resolution Local Rules. I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 31, 2023 s/ Michael C. Keats
APPLICANT



ORDER GRANTING APPLICATION
FOR ADMISSION OF ATTORNEY PRO HAC VICE

IT IS HEREBY ORDERED THAT the application of Michael C. Keats is granted, subject to the terms and conditions of Civil L.R. 11-3. All papers filed by the attorney must indicate appearance pro hac vice. Service of papers upon, and communication with, local co-counsel designated in the application will constitute notice to the party.

Dated: _____

UNITED STATES DISTRICT/MAGISTRATE JUDGE

United States District Court
Southern District of New York

Certificate of Good Standing

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

MICHAEL C. KEATS, Bar # MK2342

was duly admitted to practice in the Court on

April 20, 1999

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

Dated at
500 Pearl St.
New York, New York

On January 30, 2023



Ruby J. Krajick
Clerk of Court

By

s/ S. Gonzalez
Deputy Clerk