

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

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MY EMAIL ADDRESS OF RECORD

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

LOCAL CO-COUNSEL'S ADDRESS OF RECORD

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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: February 8, 2023

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
GRANTED
W. H. Orrick
Judge William H. Orrick
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
JUDGE