

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GETTY IMAGES (US), INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 23-135 (JLH)
	)	
STABILITY AI, LTD.	)	
and STABILITY AI, INC.,	)	
	)	
Defendants.	)	

**MOTION AND ORDER FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission *pro hac vice* of Joseph C. Gratz, Allyson R. Bennett, Timothy Chen Saulsbury, Aditya V. Kamdar and Laura Gilbert Remus of MORRISON & FOERSTER LLP to represent Defendants Stability AI, Ltd. and Stability AI, Inc. in this matter.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Michael J. Flynn  
 Jack B. Blumenfeld (#1014)  
 Michael J. Flynn (#5333)  
 1201 North Market Street  
 P.O. Box 1347  
 Wilmington, DE 19899  
 (302) 658-9200  
 jblumenfeld@morrisonichols.com  
 mflynn@morrisonichols.com  
*Attorneys for Defendants*

January 26, 2024

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**ORDER GRANTING MOTION**

IT IS HEREBY ORDERED that counsel’s motion for admission *pro hac vice* is granted.

Dated: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of California, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for Attorney Registration and Pro Hac Vice Fees effective 1/1/2024, I further certify that the filing fee of \$50.00 will be submitted to the Clerk's Office upon the filing of this motion.

Dated: January 26, 2024

/s/ Joseph C. Gratz

Joseph C. Gratz  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105-2482  
(415) 268-7000  
jgratz@mofocom

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of California, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for Attorney Registration and Pro Hac Vice Fees effective 1/1/2024, I further certify that the filing fee of \$50.00 will be submitted to the Clerk's Office upon the filing of this motion.

Dated: January 26, 2024

/s/ Allyson R. Bennett

Allyson R. Bennett  
MORRISON & FOERSTER LLP  
707 Wilshire Boulevard  
Los Angeles, CA, 90017-3543  
(213) 892-5200  
abennett@mofocom

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar of the State of California, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for Attorney Registration and Pro Hac Vice Fees effective 1/1/2024, I further certify that the filing fee of \$50.00 will be submitted to the Clerk's Office upon the filing of this motion.

Dated: January 26, 2024

*/s/ Timothy Chen Saulsbury*

Timothy Chen Saulsbury  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105-2482  
(415) 268-7000  
tsaulsbury@mofoc.com

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars for the State of California and District of Columbia, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for Attorney Registration and Pro Hac Vice Fees effective 1/1/2024, I further certify that the filing fee of \$50.00 will be submitted to the Clerk's Office upon the filing of this motion.

Dated: January 26, 2024

/s/ Aditya V. Kamdar

Aditya V. Kamdar  
MORRISON & FOERSTER LLP  
2100 L Street, NW, Suite 900  
Washington, D.C., 20037  
(202) 887-1500  
akamdar@mofocom

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bar for the State of California and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules. In accordance with Standing Order for Attorney Registration and Pro Hac Vice Fees effective 1/1/2024, I further certify that the filing fee of \$50.00 will be submitted to the Clerk's Office upon the filing of this motion.

Dated: January 26, 2024

/s/ Laura Gilbert Remus

Laura Gilbert Remus  
MORRISON & FOERSTER LLP  
707 Wilshire Boulevard  
Los Angeles, CA 90017-3543  
(213) 892-5200  
LRemus@mof.com

**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2024, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on January 26, 2024, upon the following in the manner indicated:

Tammy L. Mercer, Esquire  
Robert M. Vrana, Esquire  
YOUNG CONAWAY STARGATT & TAYLOR, LLP  
1000 North King Street  
Wilmington, DE 19801  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

Benjamin E. Marks, Esquire  
Jared R. Friedmann, Esquire  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, NY 10153  
*Attorneys for Plaintiff*

*VIA ELECTRONIC MAIL*

*/s/ Michael J. Flynn*

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Michael J. Flynn (#5333)