

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

_____)
 NATIONAL ASSOCIATION OF)
 MANUFACTURERS)
 1331 Pennsylvania Avenue, N.W.)
 Washington, DC 20004,)
)
 Plaintiff,)
)
 v.)
)
 REED ELSEVIER, INC.)
 275 Wyman Street)
 Waltham, MA 02451)
)
 and)
)
 REED ELSEVIER GROUP, plc)
 d/b/a Reed Exhibitions)
 383 Main Avenue)
 Norwalk, CT 06851,)
)
 Defendant.)
 _____)

Case No. 1:06CV00990 (HHK)

**MOTION FOR WILLIAM K WHITNER
TO APPEAR PRO HAC VICE**

Pursuant to Local Civil Rule 83.2(d), I, Scott M. Flicker, a member of the Bar of this Court and attorney at the law firm of Paul, Hastings, Janofsky & Walker, LLP in Washington D.C., respectfully move that attorney William K Whitner, Esq., of the Atlanta office of Paul, Hastings, be admitted *pro hac vice* to appear and represent Defendants Reed Elsevier, Inc. and Reed Elsevier Group, plc, in this Court for the purposes of this action only.

In support of this motion, the undersigned represents:

1. William K Whitner is a member of the firm of Paul, Hastings, Janofsky & Walker, LLP, 600 Peachtree Street, N.E., Suite 2400, Atlanta, Georgia 30308.

2. William K Whitner is a member in good standing of the Bar of the State of Georgia. He is also admitted to practice before the United States District Court for the Northern District of Georgia. He is a member in good standing in all of the above mentioned courts.

3. William K Whitner has never been denied admission or disciplined by this Court or any other court.

4. William K Whitner has fully reviewed and is familiar with the Local Rules of the United States District Court for the District of Columbia. (see attached Declaration of William K. Whitner.)

WHEREFORE, I move that this Court enter an Order permitting William K Whitner to appear *pro hac vice* in the above styled lawsuit.

Dated June 22, 2006.

/s/

Scott M. Flicker, Esq. (D.C. Bar No. 425825)
PAUL, HASTINGS, JANOFSKY & WALKER LLP
875 15th Street, N.W., Suite 1000
Washington, DC 20005
(202) 551-1700 – telephone
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CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2006, a copy of the foregoing MOTION FOR WILLIAM K. WHITNER TO APPEAR PRO HAC VICE, was served was served via ECF and U.S. mail, first-class postage prepaid, to:

Jack McKay
PILLSBURY WINTHROP SHAW PITTMAN LLP
2300 N Street, NW
Washington, DC 20037-1128

Attorneys for National Association of Manufacturers

/s/
Scott M. Flicker, Esq.