

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

UNITED STATES OF AMERICA,
c/o United States Attorney's Office
555 Fourth St., N.W.,
Washington, D.C. 20530,

Plaintiff,

v.

8 GILCREASE LANE, QUINCY
FLORIDA 32351,

and,

ONE CONDO LOCATED ON
NORTH OCEAN BOULEVARD IN
MYRTLE BEACH, SOUTH
CAROLINA,

and,

ALL FUNDS, INCLUDING
APPROXIMATELY \$53 MILLION,
HELD ON DEPOSIT AT BANK OF
AMERICA ACCOUNTS IN THE NAMES
(1) THOMAS A. BOWDOIN, JR.,
SOLE PROPRIETOR, DBA
ADSURFDAILY, (2) CLARENCE
BUSBY JR. AND DAWN STOWERS,
DBA GOLDEN PANDA AD BUILDER,
AND (3) GOLDEN PANDA
AD BUILDER,

Defendants, and

GOLDEN PANDA AD BUILDER, AND
CLARENCE BUSBY, JR.

Claimants.

**MOTION FOR ADMISSION
PRO HAC VICE**

Civil Action No: 1:08-cv-01345
Hon. Rosemary M. Collyer

MOTION FOR ADMISSION PRO HAC VICE

The above-referenced Claimants (“Claimants”), by counsel and pursuant to D.C. District Rule 83.2(d), hereby move this Honorable Court to permit D. Jack Smith, Esq., an attorney not admitted to practice before this Court, to do so for the limited purpose of representing Clarence Busby Jr., d/b/a Golden Panda Ad Builder. In support, Claimants’ counsel states as follows:

1. D. Jack Smith is an attorney licensed to practice in the states of Tennessee.
2. Mr. Smith is in good standing in each jurisdiction where he is licensed and has never been disciplined by any bar or by any court for wrongful, unethical, or unlawful conduct except for a fee dispute matter that occurred approximately 20 years ago.
3. Mr. Smith is familiar with, and agrees to be bound by, the rules of this Court and agrees to submit to this Court’s power.
4. Mr. Smith has not applied for *pro hac vice* admission before this Court within the last two years.
5. Mr. Smith’s office address and phone number is as follows:

D. Jack Smith, Esq.
Law Offices of D. Jack Smith
4620 Shady Grove Road
Memphis, TN 39117

Based on the foregoing and on the attached affidavit of Mr. D. Jack Smith, counsel for Claimants respectfully requests that this motion be granted and that Mr. D. Jack Smith be permitted to appear before this Honorable Court *pro hac vice*.

Respectfully submitted,

_____/s/_____
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Dated: August 25, 2008