

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED STATES OF AMERICA,))
Plaintiff,)	Case: 1:08-cv-01345
v.)	Hon. Rosemary M. Collyer
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))
OF (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))
ADSURFDAILY, INC., THOMAS A.))
BOWDOIN, JR., AND BOWDOIN HARRIS))
ENTERPRISES, INC.,))
Claimants.))
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**UNOPPOSED MOTION AND MEMORANDUM OF POINTS
AND AUTHORITIES TO PERMIT APPEARANCE
OF COUNSEL PRO HAC VICE**

Now comes Michael L. Fayad, undersigned counsel (hereinafter, "Counsel") for Claimants in the above captioned matter (hereinafter, the "Matter") and on behalf of Claimants, respectfully requests this Court to enter the attached Order permitting Jonathan Goodman, Esq., to appear *Pro Hac Vice* as co-counsel for Claimants in the Matter. In support of this Motion, Counsel states as follow:

1. Counsel is a member in good standing of the Bar of this Court (District of Columbia Bar Number 91694) and licensed to practice in the District of Columbia.

2. Mr. Goodman is a member in good standing of the Florida Bar (Bar Number 371912) and licensed to practice in the State of Florida.

3. Mr. Goodman is employed by the law firm of Akerman Senterfitt, One S.E. 3rd Avenue, Miami, Florida. Counsel also is employed by the law firm of Akerman Senterfitt, in the Tysons Corner, Virginia, office.

4. Attached hereto is the Declaration of Mr. Goodman in accordance with the Civil Rules of the United States District Court for the District of Columbia (hereinafter, "LCvR"), including LCvR 83.2.

5. Mr. Goodman will abide by the Civil Rules of the United States District Court for the District of Columbia and other rules of this Court.

6. Counsel for the United States do not object to this Motion.

**MEMORANDUM OF POINTS AND AUTHORITIES IN
SUPPORT OF MOTION TO APPEAR *PRO HAC VICE***

This Motion and the attached Declaration meet all of the requirements of the Civil Rules of the United States District Court for the District of Columbia including LCvR 83.

WHEREFORE, for the foregoing reasons, on behalf of Claimants, Counsel respectfully requests that the Court enter the attached Order.

Dated: August 15, 2008

Respectfully submitted,

AKERMAN SENTERFITT

By: s/Michael L. Fayad
Michael L. Fayad, Esq.
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Fax: 703-448-1801

ATTORNEY FOR CLAIMANTS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion and Memorandum of Points and Authorities to Permit Appearance of Counsel *Pro Hac Vice* was served this 15th day of August, 2008 via the Court's electronic filing system upon the following counsel:

William Rakestraw Cowden, Esq.
U.S. Attorney's Office
555 Fourth Street, NW
Washington, DC 20530

s/Michael L. Fayad
Michael L. Fayad, Esq.

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ENTERPRISES, INC.,)
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Claimants.)

ORDER GRANTING APPEARANCE PRO HAC VICE

Upon consideration of the Motion and Memorandum to permit Jonathan Goodman, Esq., to appear *Pro Hac Vice*, it appearing to the Court that the Motion should be granted, it is by the Court this _____ day of _____, 2008;

ORDERED: that the Motion be, and the same is hereby GRANTED and James Goodman, Esq., is permitted to appear in the above-captioned matter.

United States District Court Judge

COPIES TO:

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