

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FT. MYERS DIVISION**

WHITNEY INFORMATION
NETWORK, INC., a Colorado
Corporation, and RUSS WHITNEY,
an individual,

Plaintiffs,

Case No.: 2:04-cv-00047-FtM-VMC-SPC

v.

XCENTRIC VENTURES, LLC, an
Arizona limited liability company;
BADBUSINESSBUREAU.ORG., an
Arizona limited liability company, and
ED MAGEDSON, an individual,

Defendants.

**UNOPPOSED MOTION OF MARIA CRIMI SPETH AND
JONATHAN P. IBSEN TO APPEAR PRO HAC VICE**

Maria Crimi Speth, Esq. and Jonathan P. Ibsen, of Jaburg & Wilk, PC, move for special admission to appear in this case as counsel for Defendants Xcentric Ventures, LLC, Badbusinessbureau.org, and Ed Magedson (collectively, "Defendants"), and state as follows:

1. Movant Maria Crimi Speth is an attorney licensed to practice law in good standing in the States of Arizona and New York. In addition, Ms. Speth is a member of the United States District Courts for the District of Arizona, the Southern and Eastern Districts of New York, the Second and Ninth Circuit Courts of Appeal, and the United States Supreme Court.

2. Movant Jonathan P. Ibsen is an attorney licensed to practice law in good standing in the State of New York. In addition, Mr. Ibsen is a member of the United States District Court for the Southern District of New York.

3. Movants designate Michael L. Gore, of the firm Shutts & Bowen LLP, 300 South Orange Avenue, Suite 1000, P.O. Box 4956, Orlando, Florida 32802-4956, who is both qualified to practice in this Court and who consents to designation as local counsel under Local Rule 2.02.

4. Movants certify that they have never been disbarred and are not currently suspended from the practice of law in the State of Florida or any other state nor from any United States District Court or Court of Appeals.

5. Movants certify further that they are familiar with and shall be governed by the local rules of this court, the rules of professional conduct and all other requirements governing the professional behavior of members of The Florida Bar.

6. Movants certify that they have, directly by mail to the Clerk of the Court, United States District Court for the Middle District of Florida, Ft. Myers Division, forwarded payment as of the date of this Motion of the fee required pursuant to Rule 2.01(d) of the local rules of the Middle District of Florida, along with fully executed Special Attorney Admission Certifications by the Movants.

CERTIFICATION PURSUANT TO LOCAL RULE 3.01(g)

7. Pursuant to Local Rule 3.01(g), counsel has conferred with opposing counsel regarding this motion, and opposing counsel has no objection to this motion.

WHEREFORE, Movants respectfully requests admission pro hac vice in this matter.

Dated: March 19, 2005.

Respectfully submitted,

/s/ Maria Crimi Speth

Maria Crimi Speth, Esq.

JABURG & WILK PC

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/s/ Jonathan P. Ibsen

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Attorneys for Defendants Xcentric Ventures,
LLC, badbusinessbureau.org, and Ed Magedson

CONSENT TO ACT AS LOCAL COUNSEL

MICHAEL L. GORE, an attorney qualified to practice in this Court, consents to designation as local counsel for Defendants Xcentric Ventures, LLC, badbusinessbureau.org and Ed Magedson and agrees to serve as designee with whom the Court and opposing counsel may readily communicate regarding the conduct of this case, and upon whom papers shall be served, and agree to be responsible for the progress of the case, including trial.

Mailing Address /s/ Michael L. Gore
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th of March, 2005, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the following:

Scott W. Rothstein, Esquire
Christina Marie Kitterman, Esquire
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/s/ Michael L. Gore
Of counsel