

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**HEATHER MARIE KOTIS, and
RACHEL CHRISTINE MILL,**

Case No. 8:07-CV-447-T30EAJ

Plaintiffs,

v.

**DESLIN HOTELS, INC.;
IRENE L. DEVLIN;
DENNIS B. DEVLIN;
GOLDRUSH DISC JOCKEYS, INC.;
DAVID L. BARTON;
BV & BK PRODUCTIONS, LLP;
CHAD W. CIANI;
MRA HOLDINGS, LLC;
AMX PRODUCTIONS, LLC, d/b/a AMX Video,
a/k/a GM Video, a/k/a George Martin;
MANTRA FILMS, INC., d/b/a Girls Gone Wild;
JOSEPH R. FRANCES;
SVOTH, INC., d/b/a PPVNetworks and nakedontv.com; and
JUCCO HOLDINGS, INC., d/b/a drunkspringbreak.com,**

Defendants.

UNOPPOSED MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 2.02(a), William A. Delgado, hereby makes application to this Court for admission *pro hac vice* in the above-styled case, on behalf of Defendant Jucco Holdings, Inc., for the limited purpose of representing Defendant in the above-styled case. In support of this motion, undersigned counsel states the following:

1. William A. Delgado and the law firm of Willenken Wilson Loh & Lieb LLP have been retained to represent Jucco Holdings Inc. in the above-styled matter.
2. William A. Delgado is not a resident of the State of Florida.

3. William A. Delgado is a member in good standing of the bar of the United States District Court for the Central District of California.

4. William A. Delgado does not make frequent or regular appearances in separate cases to such a degree as to constitute the maintenance of a regular practice of law in the State of Florida.

5. William A. Delgado is familiar with Local Rules of the United States District Court for the Middle District of Florida and the Code of Professional Responsibility and other ethical limitations and requirements governing the professional behavior of members of The Florida Bar.

6. William A. Delgado previously filed a Written Designation and Consent to Act (Dkt. #24) designating John F. Lauro, Esquire, as local counsel in which Mr. Lauro consented to such designation.

7. William A. Delgado, in conjunction with the filing of this Motion, has submitted a Special Admission Attorney Certification and paid the fee prescribed in Local Rule 2.01 (d) with the Clerk of the Court.

8. Pursuant to Local Rule 3.01(g), undersigned counsel conferred with opposing counsel in a good faith effort to resolve the issues raised in this Motion, and opposing counsel has no objection to this Motion.

WHEREFORE, the undersigned respectfully request that this Motion for Admission *Pro Hac Vice* be granted.

Respectfully submitted this 11th day of June 2007.

LAURO LAW FIRM

s/ Scott J. Flint

JOHN F. LAURO

Fla. Bar No. 0749074

SCOTT J. FLINT

Fla. Bar No. 0085073

101 E. Kennedy Blvd., Suite 2180

Tampa, Florida 33602

T: (813) 222-8990

F: (813) 222-8991

E: jlauro@laurolawfirm.com

E: sflint@laurolawfirm.com

WILLENKEN WILSON LOH & LIEB LLP

s/ William A. Delgado

WILLIAM A. DELGADO

California Bar No. 222666

707 Wilshire Blvd., Suite 3850

Los Angeles, CA 90017

Telephone: (213) 955-9240

Facsimile: (213) 955-9250

E-mail: williamdelgado@willenken.com

COUNSEL FOR DEFENDANT

JUCCO HOLDINGS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of June 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the non-CM/ECF participants listed on the notice of electronic filing.

s/Scott J. Flint

Scott J. Flint