

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

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ARTHUR NADEL,
SCOOP CAPITAL, LLC
SCOOP MANAGEMENT, INC.

Defendants,

Case No. 8:09-cv-87-T26TBM

SCOOP REAL ESTATE L.P.,
VALHALLA INVESTMENT PARTNERS, L.P.
VALHALLA MANAGEMENT, INC.
VICTORY IRA FUND, LTD
VICTORY FUND, LTD,
VIKING IRA FIND, LLC,
VIKING FUND, LLC AND
VIKING MANAGEMENT,

Relief Defendants.

MOTION FOR SPECIAL ADMISSION TO PRACTICE

Howard Schiffman, Esquire of Schulte Roth & Zabel LLP moves for special admission to appear in this case as counsel for Goldman Sachs Execution & Clearing, L.P. Based on the reasons set forth in the following Memorandum of Law, the Court should grant this motion.

MEMORANDUM OF LAW

1. Movant is an attorney licensed to practice law in the District of Columbia and in the State of New York, and is a member of good standing of the Bars of those jurisdictions.
2. Movant is also admitted to practice before the United States District Courts for the District of Colorado, Southern District of New York, Eastern District of New York, District

of Columbia, and District of Connecticut, the United States Courts of Appeals for the Second Circuit, Eleventh Circuit and Ninth Circuit, and the United States Supreme Court and is a member in good standing of those Courts.

3. Movant certifies that he does not regularly appear in separate cases to such a degree as to constitute the maintenance of a regular practice of law in the State of Florida.

4. Movant certifies that he has recently read the most current version of the Local Rules of the United States District Court for the Middle District of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this Court for this cause only.

WRITTEN DESIGNATION AND CONSENT TO ACT

Pursuant to Local Rule 2.02(a), Movant designates as local counsel John E. Johnson, Esquire and Janelle A. Weber, Esquire of Shutts & Bowen LLP, 4301 W. Boy Scout Blvd., Suite 300, Tampa, Florida 33607, who are qualified to practice in this Court and who consent to such designation. As members of the bar of this Court and residents of the State of Florida, Mr. Johnson and Ms. Weber may be served with all notices and papers and will be responsible for the progress of the case, including the trial in default of the non-resident attorneys. The undersigned certifies that Mr. Schiffman has paid the fee prescribed in Rule 2.01(d) and has submitted the Special Admission Attorney Certification form. Mr. Schiffman will fulfill the e-mail registration requirements of Local Rule 2.01(d) when permitted to do so by this Court.

CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 3.01(g), counsel for Goldman Sachs Execution & Clearing, L.P. certify that they have conferred with counsel for Receiver, Burton W. Wiand, in a good faith effort to resolve the issue presented in this motion and there are no objections to the Motion.

Respectfully submitted,

/s/ Janelle A. Weber

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Seeking Special Admission

Attorneys for Goldman Sachs Execution &
Clearing, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 20, 2012, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system.

I FURTHER CERTIFY that on January 20, 2012, I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants:

Arthur G. Nadel
Register No. 50690-018
FCI BUTNER LOW
Federal Correction Institution
P.O. Box 999
Butner, NC 27509

/s/ Janelle A. Weber
Attorney