

FILING FEE	
PAID	75.00
In Forma Pauperis	722448
Clarence Maddox, Clerk	

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
PALM BEACH DIVISION

CASE NO. 07-80031-CIV-MIDDLEBROOKS/JOHNSON


MICHAEL L. YOUNG,

Plaintiff,

v.

REED ELSEVIER INC., et al.,

Defendants.

FILED BY   
2007 FEB 16 PM 1:42  
D.C.

**MOTION TO APPEAR PRO HAC VICE**

In accordance with Local Rule 4B of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission of Ronald I. Raether, Jr., of the law firm of Faruki Ireland & Cox P.L.L., 10 North Ludlow Street, 500 Courthouse Plaza S.E., Dayton, Ohio, 45402, for purposes of appearing as co-counsel on behalf of Defendants Reed Elsevier Inc. and Seisint, Inc.

Mr. Raether certifies herewith that he has studied the Local Rules of this Court and is a member of the bar in good standing of the State of Ohio and the United States District Court for the Southern District of Ohio.

In further support of this Motion, it is hereby designated that John R. Whittles is a member of the bar of this Court and maintains an office in this District for the practice of law. He is a person to whom the Court and counsel may readily communicate and upon whom papers may be served. In addition, the law firm of Richman Greer, P.A., One Clearlake Centre,

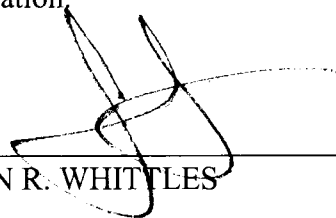
Suite 1504, 250 Australian Avenue South, West Palm Beach, Florida 33401, acts as local counsel in this matter on behalf of Defendant Reed Elsevier Inc. and Seisint, Inc.

A Certificate of Good Standing for Ronald I. Raether, Jr. is attached as Exhibit A and a proposed Order on this motion is attached as Exhibit B.

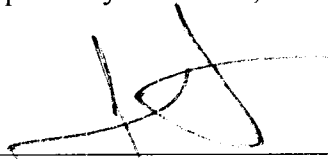
**CONSENT TO DESIGNATION**

I hereby consent to the foregoing designation

Date: Feb 16<sup>th</sup>, 2007

  
\_\_\_\_\_  
JOHN R. WHITTLES

Respectfully submitted,

  
\_\_\_\_\_  
JOHN R. WHITTLES  
Florida Bar Number 0178802  
RICHMAN GREER WEIL BRUMBAUGH  
MIRABITO & CHRISTENSEN, P.A.  
One Clearlake Centre, Suite 1504  
250 Australian Avenue South  
West Palm Beach, Florida 33401  
Telephone: (561) 803-3512  
Telecopier: (561) 820-1608  
E-mail: jwhittles@richmangreer.com

Attorneys for Defendants  
Reed Elsevier Inc. and Seisint, Inc.

**CERTIFICATE OF SERVICE**

**WE HEREBY CERTIFY** that a copy of this Motion to Appear *Pro Hac Vice* has been served via electronic mail and U.S. Mail upon the following counsel of record this ~~16<sup>th</sup>~~ day of February, 2007:

Barry S. Balmuth, Esq.  
Barry S. Balmuth, P.A.  
Centurion Tower  
1601 Forum Place, Suite 1101  
West Palm Beach, FL 33401

Counsel for Plaintiff Michael L. Young

Franklin G. Cosmen, Esq.  
Fowler White Burnett PA  
Espirito Santo Plaza  
1395 Brickell Avenue, 14th Floor  
Miami, FL 33131-3302

Counsel for Defendant Trans Union LLC

Trevor G. Hawes, Esq.  
50 North Laura Street, Suite 4100  
Jacksonville, FL 32202

Counsel for Defendants Citibank Federal Savings Bank, Citibank (West), FSB;  
and Citimortgage, Inc.

  
\_\_\_\_\_  
JOHN R. WHITTLES

AO 136 (Rev. 9/98 Certificate of Good Standing)

---

# United States District Court

SOUTHERN DISTRICT OF OHIO

## CERTIFICATE OF GOOD STANDING

I, **JAMES BONINI**, Clerk of this Court,

certify that **Ronald I. Raether, Jr.**, Bar # **0067731**,

was duly admitted to practice in this Court on

**June 3, 1997**, and is in good standing

as a member of the Bar of this Court.

Dated at **Dayton, Ohio** on **February 1, 2007**

**JAMES BONINI**, Clerk

  
**Bev Cummings**, Deputy Clerk

A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 07-80031-CIV-MIDDLEBROOKS/JOHNSON

MICHAEL L. YOUNG,

Plaintiff,

v.

REED ELSEVIER INC., et al.,

Defendants.

---

**ORDER GRANTING MOTION TO APPEAR *PRO HAC VICE***

---

**THIS CAUSE** came before the Court upon the application of Ronald I. Raether, Jr., counsel for Defendants Reed Elsevier Inc. and Seisint, Inc., for permission to appear and participate *pro hac vice* in the above-styled case. The Court, having reviewed the court file and being otherwise fully advised of the premises, finds that good cause exists to warrant granting the instant motion. It is therefore,

**ORDERED AND ADJUDGED** that the instant motion is **GRANTED**. Ronald I. Raether, Jr. is hereby granted permission to appear in the above styled action *pro hac vice* on behalf of defendants, Reed Elsevier, Inc. and Seisint, Inc.

**DONE and ORDERED** in Chambers at the United States District Courthouse, West Palm Beach, Florida, this \_\_\_ day of February, 2007.

---

UNITED STATES DISTRICT JUDGE  
Southern District of Florida

B