

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

SHANA SANDLER, a resident of)
 High Point, County of Guilford,)
 State of North Carolina)
)
 Plaintiff)
)
 v.)
)
 MIA CALCAGNI, a resident of)
 Winthrop, County of Kennebec,)
 State of Maine,)
)
 EMET GABAR,)
 JOHN DOE, and/or)
 JANE DOE, Co-Authors,)
)
 BOOKSURGE, LLC, a South Carolina)
 corporation with a place of business in)
 Greenville, County of Greenville,)
 State of South Carolina)

Case No. 07-CV-00029-DBH

MOTION TO ADMIT MATTHEW J. SEGAL AND STEPHEN A. SMITH AS A VISITING ATTORNEYS PURSUANT TO LOCAL RULE 83.1

I, Steven P. Wright, a member in good standing of the Bar of this Court, and an attorney with the law firm of Kirkpatrick & Lockhart Preston Gates Ellis LLP, which is counsel of record for the Defendant Booksurge, LLC (“Booksurge”), hereby respectfully move this Court that Matthew J. Segal and Stephen A. Smith be admitted to appear and practice as visiting lawyers pursuant to Local Rule 83.1(c). In support of this motion, I state as follows:

1. Matthew J. Segal is a member of good standing of the bars of the State of Washington, the United States District Court for the Western District of Washington, the United

States District Court for the Eastern District of Washington, the United States Court of Appeals for the Ninth Circuit, and the United States Court of Appeals for the Fourth Circuit.

2. Mr. Segal is a partner in the law firm of Kirkpatrick & Lockhart Preston Gates Ellis LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158.

3. There are no disciplinary proceedings pending (nor have any ever been brought) against Mr. Segal.

4. Mr. Segal is familiar with the Local Rule of the Federal District Court for the District of Maine.

5. As reflected in the Affidavit of Matthew J. Segal, which is submitted herewith, Mr. Segal meets all of the requirements to be admitted as a visiting attorney pursuant to Local Rule 83.1(c) and has knowledge of the underlying facts that will materially aid Booksurge in the defense of this action.

6. Stephen A. Smith is a member of good standing of the bars of the State of Washington, the United States Courts of Appeals for the Sixth and Ninth Circuits, and numerous United States District Courts including the Western District of Washington and the Eastern District of Washington.

7. Mr. Smith is a partner in the law firm of Kirkpatrick & Lockhart Preston Gates Ellis LLP, 925 Fourth Avenue, Suite 2900, Seattle, WA 98104-1158.

8. There are no disciplinary proceedings pending (nor have any ever been brought) against Mr. Smith.

9. Mr. Smith is familiar with the Local Rule of the Federal District Court for the District of Maine.

10. As reflected in the Affidavit of Stephen A. Smith, which is submitted herewith, Mr. Smith meets all of the requirements to be admitted as a visiting attorney pursuant to Local Rule 83.1(c) and has knowledge of the underlying facts that will materially aid Booksurge in the defense of this action.

11. Mr. Segal and Mr. Smith are currently counsel for Booksurge LLC and, as visiting attorneys, will be associated with Steven P. Wright, who is a member of good standing in this Court.

WHEREFORE, Booksurge, LLC, respectfully requests that this Court admit Matthew J. Segal and Stephen A. Smith as visiting attorneys pursuant to Local Rule 83.1(c).

BOOKSURGE, LLC

By its attorney,

/s/ Steven P. Wright

Steven P. Wright (ME BBO# 009473)

Kirkpatrick & Lockhart Preston

Gates Ellis LLP

State Street Financial Center

One Lincoln Street

Boston, MA 02111-2950

May 7, 2007

CERTIFICATE OF SERVICE

I, Steven P. Wright, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on May 7, 2007.

/s/ Steven P. Wright
Steven P. Wright