

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
 JOE W. KUEFLER, Individually and on )  
 Behalf of All Others Similarly Situated )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 WEBLOYALTY.COM, INC. and )  
 FANDANGO, INC. d/b/a )  
 FANDANGO.COM )  
 )  
 Defendants. )  
 \_\_\_\_\_)

CIVIL ACTION NO. 06-cv-11620-JLT

**MOTION TO ADMIT C. NICHOLE GIFFORD PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b) and on behalf of the defendants, Webloyalty.com, Inc. (“Webloyalty”) and Fandango, Inc., d/b/a Fandango.com (“Fandango”), Gabrielle Wolohojian moves for the admission *pro hac vice* of C. Nichole Gifford, and states as follows:

1. I am a member of the bar of this Court in good standing.
2. C. Nichole Gifford graduated from University of Memphis Law School and is admitted to practice law in the United States District Court for the District of Columbia.
3. C. Nichole Gifford is an attorney at Rothwell, Figg, Ernst & Manbeck, 1425 K Street N.W., suite 800, Washington D.C. 20005.
4. C. Nichole Gifford is a member in good standing of the Tennessee and District of Columbia bars.
5. There are no disciplinary proceedings against C. Nichole Gifford and she is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Gabrielle Wolohojian requests that C. Nichole Gifford of Rothwell, Figg, Ernst & Manbeck, 1425 K Street N.W., suite 800, Washington D.C. 20005 be admitted to practice before this Court for all purposes in connection with the representation of the defendants in this proceeding.

Respectfully submitted,

/s/ Gabrielle Wolohojian  
Gabrielle Wolohojian (BBO #555704)  
Gabrielle.Wolohojian@wilmerhale.com  
Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, MA 02109  
Phone: 617-526-6000  
Fax: 617-526-5000

Dated: October 31, 2006

Certificate of Service

I, Gabrielle R. Wolohojian, hereby certify that a true and accurate copy of the above document has been filed and served through the Court's electronic filing system, this 31st day of October, 2006.

/s/ Gabrielle Wolohojian

**RULE 7.1(A)(2) STATEMENT**

Counsel for Defendants has conferred with counsel for Joe W. Kuefler and all parties consent to this motion.

/s/ Gabrielle Wolohojian

**CERTIFICATE OF GOOD STANDING**

Pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, I, C. Nichole Gifford hereby certify that:

1. I was admitted to the bar of the State of Tennessee in November 1999 and to the bar for the District of Columbia in November 2001. I have also been admitted to practice in the United States District Court for the District of Columbia (November 2001).
2. I am a member in good standing in every jurisdiction where I have been admitted to practice.
3. No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.
5. My name and employment contact information are as follows:

C. Nichole Gifford  
Rothwell, Figg, Ernst & Manbeck  
1425 K Street N.W. Suite 800  
Washington D.C. 20005  
(202)783-6040

Dated: October 10, 2006

/s/ C. Nichole Gifford