

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ANGELO BINNO,)	
)	
Plaintiff,)	
)	Case No.: 2:11-CV-12247
v.)	
)	Hon. Denise Page Hood
THE AMERICAN BAR ASSOCIATION,)	
)	
Defendant.)	
)	
	/	

Richard H. Bernstein (P58551)
Michael J. Blau (P34834)
The Sam Bernstein Law Firm
Attorneys for Plaintiff Angelo Binno
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MOTION FOR LAW STUDENT PRACTICE

PLEASE TAKE NOTICE that the Plaintiff, Angelo Binno, hereby moves the Court to permit law student, Jason M. Turkish, to assist in the representation in this matter and in support of said motion states as follows:

1. That this motion is brought pursuant to the authority provided in LR 83.21, Law Student Practice.
2. That Jason M. Turkish recently completed his second year of law study in good standing at the Northwestern University School of Law, an ABA approved law school located in Chicago, Illinois.

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3. That Mr. Turkish meets the eligibility requirements proscribed in LR 83.21(b) to participate in a legal aid clinic and assist in the representation of this matter as detailed in Exhibit 1: Letter of Audra Wilson, Northwestern University School of Law.
4. That at all times relevant hereto Mr. Turkish will be supervised by Richard H. Bernstein, a member of the Bar of this Court and Plaintiff's lead counsel in this matter.
5. That further, Plaintiff, Angelo Binno requests that Mr. Turkish assist in the representation of his claim because of his knowledge of the facts and law pertaining to the case and submits his Affidavit in support of this motion as Exhibit 2.
6. That Mr. Turkish is a talented law student who fully understands and respects the responsibilities of this assignment and is familiar with the operation of the United States District Court for the Eastern District of Michigan through his prior successful work experience as an undergraduate intern to the Honorable Avern Cohn.

WHEREFORE, Plaintiff requests the relief set forth below.

PRAYER FOR RELIEF

Plaintiff prays for the following relief:

7. That an order be entered by this Honorable Court allowing law student, Jason M. Turkish, to practice in this matter pursuant to the authority provided in LR 83.21 Law Student Practice.
8. All other relief that this Court deems just and proper.

Respectfully submitted,

By Richard Bernstein
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Dated: June 10, 2011

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ANGELO BINNO,

Plaintiff,

v.

THE AMERICAN BAR ASSOCIATION,

Defendant.

BRIEF IN SUPPORT OF MOTION FOR LAW STUDENT PRACTICE

WHEREFORE, Plaintiff requests that an order be entered by this Honorable Court allowing law student, Jason M. Turkish , to practice in this matter pursuant to the authority provided in LR 83.21 Law Student Practice.

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