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12 Attorneys for Defendants Saxon Mortgage
13 Services and Deutsche Bank National
14 Trust Company as Trustee for IXIS Real
15 Estate Capital Trust 2006-HE1

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS KNIPPEL, an individual, and
GLORIA KNIPPEL, an individual,

Plaintiffs,

v.

SAXON MORTGAGE SERVICES;
DEUTSCHE BANK NATIONAL TRUST
CO.; LENDER PROCESSING SERVICES;
LPS DEFAULT SOLUTIONS, INC.; LPS
FORECLOSURE SOLUTIONS, INC.;
QUALITY LOAN SERVICE CORP.;
MCCARTHY & HOLTHUS, LLP; MOSS
CODILIS LLP; DOE Defendants I through X,
inclusive; and ROE CORPORATIONS A
through Z, inclusive,

Defendants.

CASE NO. 2:10-cv-001726

**VERIFIED PETITION OF
THOMAS J. CUNNINGHAM, ESQ. FOR
PERMISSION TO PRACTICE PRO
HAC VICE IN THIS CASE AND
DESIGNATION OF LEAD COUNSEL**

EFFECTIVE NOVEMBER 11, 2010
FILING FEE IS \$175.00

Thomas J. Cunningham, Esq., Petitioner, respectfully represents to the Court:

1. Petitioner resides at 5220 Benton, Downers Grove, Illinois 60615.

2. Petitioner is an attorney at law and a member of the law firm of LOCKE LORD

BISSELL & LIDDELL LLP with offices at 111 South Wacker Drive, Chicago, Illinois 60606 (312)

443-0656, tcunningham@lockelord.com.

1 3. Petitioner has been retained personally or as a member of the law firm by Saxon
 2 Mortgage Services, Inc. and Deutsche Bank National Trust Company as Trustee for IXIS Real Estate
 3 Capital Trust 2006-HE1 to provide legal representation in connection with the above-entitled case
 4 now pending before this Court.

5 4. Since 1993 Petitioner has been and presently is a member in good standing of the bar
 6 of the highest Court of the State of Illinois where Petitioner regularly practices law.

7 5. Petitioner was admitted to practice before the following Courts on the dates indicated
 8 for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

<u>Federal/State Admissions</u>	<u>Status (Active/Inactive)</u>	<u>Date Admitted</u>	<u>Bar Number</u>
State Bar of Illinois	Active	1993	6215928
State Bar of California	Active	2009	263729
United States Supreme Court	Active	1996	
United States Seventh Circuit Court of Appeals	Active	1993	
United States Ninth Circuit Court of Appeals	Active	2008	
United States District Court, Northern District of Illinois	Active	1993	
United States District Court, Central District of Illinois	Active	1996	
United States District Court, Southern District of Illinois	Active	2003	
United States District Court, Western District of Michigan	Active	2002	
United States District Court, Eastern District of Wisconsin	Active	2009	
United States District Court, Central District of California	Active	2009	
United States District Court, Eastern District of California	Active	2009	
United States District Court, Northern District of California	Active	2009	
United States District Court, Southern District of California	Active	2009	

1 6. There are or have been no disciplinary proceedings instituted against Petitioner, nor
2 any suspension of any license, certificate or privilege to appear before any judicial, regulatory or
3 administrative body, or any resignation or termination in order to avoid disciplinary or disbarment
4 proceedings, except as described in detail below: Not applicable.

5 7. Has Petitioner ever been denied admission to the State Bar of Nevada? (If yes, give
6 particulars of every denied admission): No.

7 8. Petitioner is a member of good standing in the following Bar Associations:

8 American Bar Association; Los Angeles County Bar Association.

9 9. Petitioner or any member of Petitioner's firm (or office if firm has offices in more
10 than one city) with which Petitioner is associated has/have filed application(s) to appear as counsel
11 under Local Rule IA 10-2 during the past three (3) years in the following matters:

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
June 22, 2009; December 3, 2009	<i>Goodwin, et al. v. Executive Trustee Services, LLC, et al;</i> <i>Case No. 3:09-cv-00306-ECR</i>	United States District Court for the District of Nevada	Both Granted
July 8, 2009	<i>Lopez, et al. v. Executive Trustee Services, LLC, et al;</i> <i>Case No. 3:09-cv-180-ECR</i>	United States District Court for the District of Nevada	Granted
August 3, 2009	<i>Green, et al. v. Countrywide Home Loans, Inc., et al.;</i> <i>Case No. 3:09-cv-00374-BES</i>	United States District Court for the District of Nevada	Granted
September 17, 2009	<i>Local AD Link, Inc., et al. v. Adzzoo, LLC, et al., Case No. 2:09-cv-01564-RCJ-L RL</i>	United States District Court for the District of Nevada	Granted
October 2, 2009	<i>Dalton, et al. v. Citimortgage, Inc., et al.; Case No. 3:09-cv-00534-ECR-V PC</i>	United States District Court for the District of Nevada	Granted

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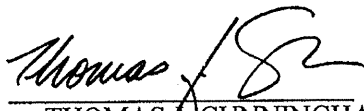
July 14, 2010	<i>State of Nevada, et al. v. Countrywide Home Loans Servicing LP, et al., Case No. 3:10-cv-00419-RCJ-P AL</i>	United States District Court for the District of Nevada	Granted
September 23, 2010	<i>Abdolhamid Ahmadi v. Wilson Resources, Inc., et al., Case No. 3:10-cv-00587 RCJ VPC</i>	United States District Court for the District of Nevada	Granted

10. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

11. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

12. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

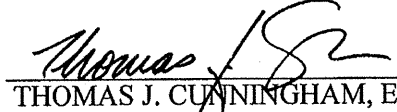
That Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR THE PURPOSES OF THIS CASE ONLY.



 THOMAS J. CUNNINGHAM, ESQ.

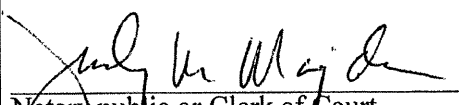
STATE OF ILLINOIS)
) ss:
 COUNTY OF COOK)

Thomas J. Cunningham, Esq., Petitioner, being first duly sworn, deposes and says: That the foregoing statements are true.

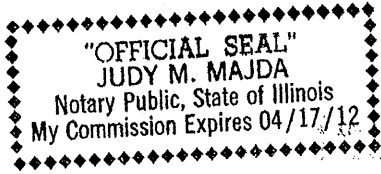


 THOMAS J. CUNNINGHAM, ESQ.

Subscribed and sworn to before me this 23rd day of November, 2010.



 Notary public or Clerk of Court

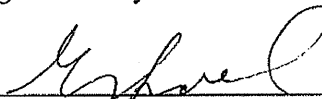



1 **DESIGNATION OF RESIDENT ATTORNEY**
2 **ADMITTED TO THE BAR OF THIS COURT**
3 **AND CONSENT THERETO.**

4 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
5 believes it to be in the best interests of the client(s) to designate Gregg A. Hubley, Attorney at Law,
6 member of the State of Nevada and previously admitted to practice before the above-entitled Court
7 as associate residence counsel in this action. The address of said designated Nevada counsel is:
8 Pite Duncan, LLP
701 E. Bridger Avenue, Suite 700
Las Vegas, Nevada 89101
(702) 991-4632

9
10 By this designation the Petitioner and undersigned party(ies) agree that this designation
11 constitutes agreement and authorization for the designated resident admitted counsel to sign
12 stipulations binding on all of us.

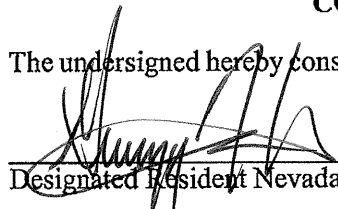
13 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

14 The undersigned party(ies) appoints Gregg A. Hubley of PITE DUNCAN LLP as its
15 Designated Resident Nevada Counsel in this case.
16 Saxon Mortgage Services, Inc. 
Party Signature

17
18 Deutsche Bank National Trust Company
as Trustee for IXIS Real Estate Capital
Trust 2006-HE1, by
19 Saxon Mortgage Services, Inc. 
Party Signature

20 **CONSENT OF DESIGNEE**

21 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

22
23 
24 Designated Resident Nevada Counsel's Signature

7386
Bar number

25 **UPON THE COURT'S FINDING OF GOOD CAUSE,**
26 **IT IS HEREBY APPROVED** this 2nd day of December, 2010.

27 
28 Glotia M. Navarro
United States District Judge