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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

Case #2:12-cv-00182-ECR-VCF

IN RE ZAPPOS SECURITY BREACH  
LITIGATION

-----  
THIS DOCUMENT RELATES TO:

ALL ACTIONS

CORRECTED

VERIFIED PETITION FOR  
PERMISSION TO PRACTICE  
IN THIS CASE ONLY BY  
ATTORNEY NOT ADMITTED  
TO THE BAR OF THIS COURT  
AND DESIGNATION OF  
LOCAL COUNSEL

(Re: 2:12-cv-00232 Doc. 12)

ORDER GRANTING

JEREMIAH FREI-PEARSON, Petitioner, respectfully represents to the Court:  
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of  
Meiselman, Denla, Packman, Carton & Eberz, P.C.

(firm name)

with offices at 1311 Mamaroneck Avenue,  
(street address)

White Plains, New York, 10605,  
(city) (state) (zip code)

914-517-5000, jfrei-pearson@mdpcelaw.com,  
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by  
Shari Simon and Katharine Vorhoff to provide legal representation in connection with  
[client(s)]

the above-entitled case now pending before this Court.

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3. That since September 22, 2004, Petitioner has been and presently is a  
(date)  
member in good standing of the bar of the highest Court of the State of New York  
(state)  
where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or  
from the clerk of the supreme court or highest admitting court of each state, territory, or insular  
possession of the United States in which the applicant has been admitted to practice law certifying  
the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District  
Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts  
of other States on the dates indicated for each, and that Petitioner is presently a member in good  
standing of the bars of said Courts.

Court	Date Admitted	Bar Number
<u>New York State Court</u>	<u>September 22, 2004</u>	<u>423922</u>
<u>U.S. District Court, Southern District of New York</u>	<u>September 22, 2004</u>	<u>JFP 1509</u>
<u>U.S. District Court, Eastern District of New York</u>	<u>September 22, 2004</u>	<u>JFP 1509</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

5. That there are or have been no disciplinary proceedings instituted against petitioner,  
nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory  
or administrative body, or any resignation or termination in order to avoid disciplinary or  
disbarment proceedings, except as described in detail below:

N/A

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6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

No.

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

N/A

8. Petitioner has filed application(s) to appear as counsel 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
N/A			

(If necessary, please attach a statement of additional applications)

9. 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.

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

11. 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.

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

Jeremiah Frel-Pearson  
Petitioner's signature

STATE OF New York }  
COUNTY OF Westchester }

Jeremiah Frel-Pearson, Petitioner, being first duly sworn, deposes and says:  
That the foregoing statements are true.

Jeremiah Frel-Pearson  
Petitioner's signature

Subscribed and sworn to before me this

13 day of March, 2012.

Annette D. Hise  
Notary Public or Clerk of Court

ANNETTE D. HISE  
Notary Public, State of New York  
No. 01H16139179  
Qualified in County of Dutchess  
Commission Expires January 03, 2014

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

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Brent A. Carson,  
(name of local counsel)  
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

510 South Eighth Street  
(street address)

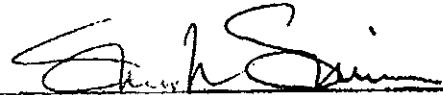
Las Vegas, Nevada, 89101  
(city) (state) (zip code)

702-471-1111, bac@winmercarson.com  
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.

4  
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6  
7 The undersigned party(ies) appoint(s) BRENT A. CARSON as  
8 his/her/their Designated Resident Nevada Counsel in this case.  
(name of local counsel)


9  
10   
(Party signature)

11  
12 \_\_\_\_\_  
(Party signature)

13  
14 \_\_\_\_\_  
(Party signature)

15  
16 **CONSENT OF DESIGNEE**

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

18  
19   
20 \_\_\_\_\_  
Designated Resident Nevada Counsel's signature

21 5903 bac@winnercarson.com  
22 Bar number Email address

23 APPROVED:

24 Dated: this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_

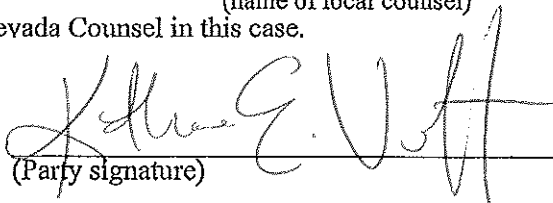
25 SEE BELOW

26 \_\_\_\_\_  
27 UNITED STATES DISTRICT JUDGE

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes  
2 agreement and authorization for the designated resident admitted counsel to sign stipulations  
3 binding on all of us.  
4

5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6  
7 The undersigned party(ies) appoint(s) BRENT A. CARSON as  
8 his/her/their Designated Resident Nevada Counsel in this case.  
9


10   
11 (Party signature)

12 \_\_\_\_\_  
13 (Party signature)

14 \_\_\_\_\_  
15 (Party signature)

16 **CONSENT OF DESIGNEE**

17 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.  
18

19   
20 Designated Resident Nevada Counsel's signature

21 5903 bacewin@verizon.com  
22 Bar number Email address

23 APPROVED:

24 Dated: this 14th day of March 2012.

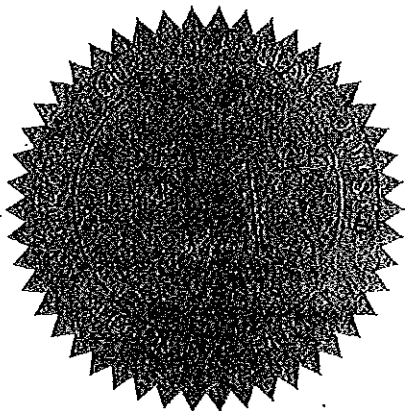
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26 Edward C. Reed.  
27 UNITED STATES DISTRICT JUDGE



**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Jeremiah Lee Krei-Pearson** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 22<sup>nd</sup> day of **September 2004**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **February 23, 2012**.



*Aprilanne Agostino*

Clerk of the Court