

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,

Plaintiff(s),

vs.

AMG SERVICES, INC., et al.,

Defendant(s).

Case #2:12-cv-00536-GMN-VCF

**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**

FILING FEE IS \$250.00

Sanjay Bhandari, 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
McNamara Benjamin LLP

(firm name)

with offices at 501 West Broadway, Suite 2020,
(street address)

San Diego, California, 92101,
(city) (state) (zip code)

619-269-0400, sbhandari@mcnamarallp.com.
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
Thomas W. McNamara, Monitor to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

3. That since April 26, 1996, Petitioner has been and presently is a
(date)
member in good standing of the bar of the highest Court of the State of California
(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.S.D.C., Southern District of California | 10/4/1999 | 181920 |
| U.S.D.C., Northern District of California | 3/10/1997 | 181920 |
| U.S.D.C., Central District of California | 11/17/1998 | 181920 |
| U.S. Court of Appeals for the Ninth Circuit | 1/28/1999 | 181920 |
| | | |
| | | |
| | | |

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:

(State "none" if Petitioner has no disciplinary proceedings, etc.) None.

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

(State "none" if Petitioner has never been denied admission.) None.

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

(State "none" if Petitioner is not a member of other Bar Associations.)
State Bar of California

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

| Date of Application | Cause | Title of Court Administrative Body or Arbitrator | Was Application Granted or Denied |
|---------------------|-------|--|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

(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.

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

[Handwritten Signature]

Petitioner's signature

3
4 STATE OF California)
5 COUNTY OF San Diego)
6

7 Sanjay Bhandari, Petitioner, being first duly sworn, deposes and says:

8 That the foregoing statements are true.

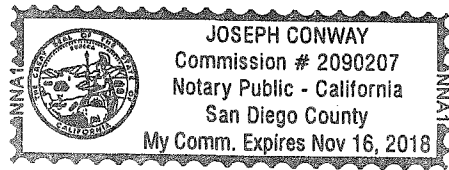
[Handwritten Signature]

Petitioner's signature

9
10 Subscribed and sworn to before me this

11 18th day of APRIL, 2017.

12
13 *[Handwritten Signature]*
14 Notary Public or Clerk of Court



15
16 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
17 THE BAR OF THIS COURT AND CONSENT THERETO.**

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

24 100 North City Parkway, Suite 1750,
(street address)
25 Las Vegas, Nevada, 89106-4617,
(city) (state) (zip code)
26 702-868-7523, vigila@ballardspahr.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) Abran Vigil as
8 his/her/their Designated Resident Nevada Counsel in this case.
9

10 
11 _____
12 (party's signature)

13 Thomas W. McNamara, Monitor
14 (type or print party name, title)

15 _____
16 (party's signature)

17 _____
18 (type or print party name, title)

19 **CONSENT OF DESIGNEE**

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

21 
22 _____
23 Designated Resident Nevada Counsel's signature

24 7548 vigila@ballardspahr.com
25 Bar number Email address

26 APPROVED:

27 Dated: this 19 day of April, 20 17.

28 

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of April, 2017, pursuant to Fed. R. Civ. P. 5(b), I served via CM/ECF or delivered by email and mailing in the U.S. Mail a true and correct copy of the foregoing a true and correct copy of the foregoing **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**, postage prepaid and addressed to the following:

VIA CM/ECF

Blaine T. Welsh
U.S. Attorney's Office
333 Las Vegas Blvd. South, Suite 5000
Las Vegas, NV 89101
Tel.: 702-388-6336
Email: Blaine.Welsh@usdoj.gov
Attorneys for FTC

VIA CM/ECF

Jeremy R. Vanderloop
Madden Vanderloop, S.C.
116 S. Main Street
Mayville, WI 53050
Tel.: 920-387-2300
Fax: 920-387-4428
Email: jvanderloop@madvanlaw.com
Attorneys for Interested Parties ETS Ventures, LLC; El Dorado Trailer Sales

VIA CM/ECF

Kimberly L. Nelson
Federal Trade Commission
600 Pennsylvania Ave. NW
Mail Stop CC-9528
Washington, DC 20580
Tel.: 202-326-3304
Fax: 202-326-3197
Email: knelson@ftc.gov
Attorneys for FTC

VIA CM/ECF

Nicole Ducheneaux
Fredericks Peebles & Morgan LLP
3610 North 163rd Plaza
Omaha, NE 68116
Tel.: 402-333-4053
Fax: 402-333-4761
Email: nducheneaux@ndnlaw.com
Attorneys for Red Cedar Services, Inc., dba 500FastCash; SFS, Inc., dba OneClickCash

VIA CM/ECF

Conly J. Schulte
Fredericks Peebles & Morgan LLP
1900 Plaza Drive
Louisville, CO 80027
Tel.: 303-673-9600
Fax: 303-673-9839
Email: cschulte@ndnlaw.com
Attorneys for Red Cedar Services, Inc., dba 500FastCash; SFS, Inc., dba OneClickCash; AMG Capital Management, LLC; LeadFlash Consulting, LLC

VIA CM/ECF

Martin L. Welsh
Law Office of Hayes & Welsh
199 N. Arroyo Grande Blvd.
Henderson, NV 89074
Tel.: 702-434-3444
Fax: 702-434-3739
Email: mwelsh@lvlaw.com
Attorneys for Interested Parties ETS Ventures, LLC; El Dorado Trailer Sales

VIA CM/ECF

Francis J. Nyhan
Fredericks Peebles & Morgan LLP
2020 L Street, Ste. 250
Sacramento, CA 95811
Tel.: 916-441-2700
Fax: 916-441-2067
Email: jnyhan@ndnlaw.com
Attorneys for Red Cedar Services, Inc., dba 500FastCash; SFS, Inc., dba OneClickCash

VIA CM/ECF

Joshua M. Dickey
Bailey Kennedy
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302
Tel.: 702-562-8820
Fax: 702-562-8821
Email: jdickey@baileykennedy.com
Attorneys for Red Cedar Services, Inc., dba 500FastCash; SFS, Inc., dba OneClickCash

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VIA CM/ECF

Victoria W. Ni
Public Justice, PC
555 - 12th Street, Suite 1230
Oakland, CA 94607
Tel.: 510-622-8150
Fax: 510-622-8155
Email: vni@publicjustice.net
*Attorneys for Intervenor Americans for
Financial Reform*

VIA CM/ECF

Paul C. Ray
Paul C. Ray, Chtd.
3560 West Cheyenne Avenue, Suite 130
North Las Vegas, NV 89032
Tel.: 702-723-2292
Fax: 702-823-2384
Email: paulcraylaw@aol.com
*Attorneys for AMG Capital Management, LLC;
Level 5 Motorsports, LLC; Black Creek
Capital Corporation; Broadmoor Capital
Partners, LLC; Scott A. Tucker; Park 269
LLC; Kim C. Tucker*

VIA CM/ECF

Craig B. Friedberg
Law Offices of Craig B. Friedberg
4760 South Pecos Road, Suite 103
Las Vegas, NV 89121
Tel.: 702-435-7968
Fax: 702-946-0887
Email: attcbf@cox.net
*Attorneys for Intervenor Americans for
Financial Reform*

/S/ Edward Chang
Edward Chang
*Attorneys for the Court-appointed Monitor,
Thomas W. McNamara*

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TABLE OF CONTENTS

| <u>Exhibit</u> | <u>Page</u> |
|---------------------------------|-------------|
| A Certificate of Standing | 1 |

EXHIBIT A

Certificate of Standing

EXHIBIT A



THE STATE BAR OF CALIFORNIA

MEMBER RECORDS & COMPLIANCE

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

March 15, 2017

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, SANJAY BHANDARI, #181920 was admitted to the practice of law in this state by the Supreme Court of California on April 26, 1996; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in cursive script, appearing to read "Kathan Lambert".

Kathan Lambert
Custodian of Membership Records