

1 WRIGHT, FINLAY & ZAK, LLP
 2 Darren T. Brenner, Esq.
 3 Nevada Bar No. 8386
 4 Ramir M. Hernandez, Esq.
 5 Nevada Bar No. 13146
 6 7785 W. Sahara Ave., Suite 200
 7 Las Vegas, NV 89117
 8 (702) 475-7964; Fax: (702) 946-1345
 9 rhernandez@wrightlegal.net

10 *Attorneys for Defendants National Collegiate Master Student Loan Trust I, National Collegiate*
 11 *Student Loan Trust ("NCSLT") 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1, NCSLT*
 12 *2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-4, NCSLT*
 13 *2007-1, NCSLT 2007-2, NCSLT 2007-3, and NCSLT 2007-4*

14 **UNITED STATES DISTRICT COURT**
 15 **DISTRICT OF NEVADA**

16 Richard Klein and Raymond Urias,
 17 individually and on behalf of all others
 18 similarly situated,

19 Plaintiffs,

20 vs.

21 National Collegiate Student Loan Trust aka
 22 National Collegiate Master Student Loan Trust
 23 I, National Collegiate Student Loan Trust 2003-
 24 1, National Collegiate Student Loan Trust
 25 2004-1, National Collegiate Student Loan Trust
 26 2004-2, National Collegiate Student Loan Trust
 27 2005-1, National Collegiate Student Loan Trust
 28 2005-2, National Collegiate Student Loan Trust
 2005-3, National Collegiate Student Loan Trust
 2006-1, National Collegiate Student Loan Trust
 2006-2, National Collegiate Student Loan Trust
 2006-3, National Collegiate Student Loan Trust
 2006-4, National Collegiate Student Loan Trust
 2007-1, National Collegiate Student Loan Trust
 2007-2, National Collegiate Student Loan Trust
 2007-3, and National Collegiate Student Loan
 Trust 2007-4,

Defendants.

Case No.: 2:22-cv-01392-GMN-BNW

**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

R. James DeRose III, Petitioner, respectfully represents to the Court:

1 1. That Petitioner is an attorney at law and a member of the law firm of Locke Lord
2 LLP with offices at 200 Vesey Street, 20th Floor, New York, NY 10281, (212) 415-8600,
3 rderose@lockelord.com.

4 2. That Petitioner has been retained by Defendants, National Collegiate Master
5 Student Loan Trust I, National Collegiate Student Loan Trust (“NCSLT”) 2003-1, NCSLT 2004-
6 1, NCSLT 2004-2, NCSLT 2005-1, NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT
7 2006-2, NCSLT 2006-3, NCSLT 2006-4, NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and
8 NCSLT 2007-4, incorrectly sued as unknown purported entity “NCSLT aka National Collegiate
9 Master Student Loan Trust I, NCSLT 2003-1, NCSLT 2004-1, NCSLT 2004-2, NCSLT 2005-1,
10 NCSLT 2005-2, NCSLT 2005-3, NCSLT 2006-1, NCSLT 2006-2, NCSLT 2006-3, NCSLT 2006-
11 4, NCSLT 2007-1, NCSLT 2007-2, NCSLT 2007-3, and NCSLT 2007-4,” to provide legal
12 representation in connection with the above-entitled case now pending before this Court.

13 3. That since June 7, 2004, Petitioner has been and presently is a member in good
14 standing of the bar of the highest Court of the State of New York where Petitioner regularly
15 practices law. Petitioner shall attach a certificate from the state bar or from the clerk of the supreme
16 court or highest admitting court of each state territory, or insular possession of the United States
17 in which applicant has been admitted to practice law certifying the applicant’s membership therein
18 is in good standing.

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

23	Court	Date Admitted	Bar Number
24	Supreme Court of New York	6/7/2004	4241683
25	United States District Court of the Eastern District of New York	5/11/2005	--
26	United States District Court of the Southern District of New York	4/12/2005	--
27	United States District Court of the Western District of Michigan	3/23/2017	--
28	United States Court of Appeals for the Second Circuit	10/12/2016	--

1	United States Court of Appeals for the Sixth Circuit	8/8/2017	--
2	United States Court of Appeals for the Seventh Circuit	10/26/2011	--
3	United States Court of Appeals for the Eighth Circuit	9/14/2018	--
4	United States Court of Appeals for the Ninth Circuit	12/17/2009	--

5 5. That there have been no disciplinary proceedings instituted against Petitioner, nor
6 any suspension of any license, certificate or privilege to appear before any judicial, regulatory or
7 administrative body, or any resignation or termination in order to avoid disciplinary or disbarment
8 proceedings.

9 6. That Petitioner has never been denied admission to the State Bar of Nevada.

10 7. That Petitioner is a not a member of good standing in any Bar Associations.

11 8. Petitioner has not filed any applications to appear as counsel under Local Rule IA
12 11-2 (formerly LR IA 10-2) during the past three (3) years.

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

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

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

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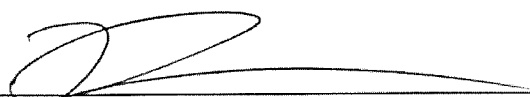
1 Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR
2 THE PURPOSES OF THIS CASE ONLY.



R. JAMES DEROSE III


3
4 STATE OF NEW YORK)
5 COUNTY OF NEW YORK)

6
7 R. James DeRose III, Petitioner, being first duly sworn, deposes and says: That the foregoing
8 statements are true.



R. JAMES DEROSE III

9
10 Subscribed and sworn to before me this
11 8th day of November, 2022.

12 
13 Notary Public or Clerk of Court

VIENNA MESSINA
NOTARY PUBLIC, STATE OF NEW YORK
Registration No. 02ME6431865
Qualified in New York County
My Commission Expires 5-31-2026

14
15 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO**
16 **THE BAR OF THIS COURT AND CONSENT THERETO.**

17 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes
18 it to be in the best interests of the clients to designate Ramir M. Hernandez, Attorney at Law, member
19 of the State of Nevada and previously admitted to practice before the above-entitled Court as associate
20 resident counsel in this action. The address and email address of said designated Nevada counsel is:

21 WRIGHT, FINLAY & ZAK, LLP
22 7785 W. Sahara Ave, Suite 200
23 Las Vegas, NV 89117
(702) 475-7964; Fax (702) 946-1345
rhernandez@wrightlegal.net


24 By this designation, Petitioner and undersigned party agree that this designation constitutes agreement
25 and authorization for the designated resident admitted counsel to sign stipulations binding on all of us.

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APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL

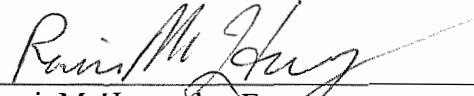
The undersigned party appoints Ramir M. Hernandez, Esq. as their Designated Resident Nevada Counsel in this case.



Bradley Luke
Senior Director, Legal Compliance
Transworld Systems Inc.

CONSENT OF DESIGNEE

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

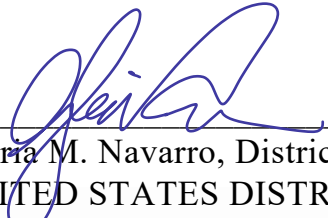


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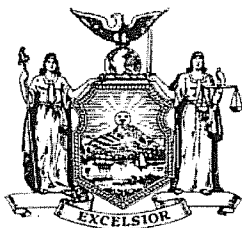
ORDER

IT IS SO ORDERED.

Dated this 9 day of November, 2022.



Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT



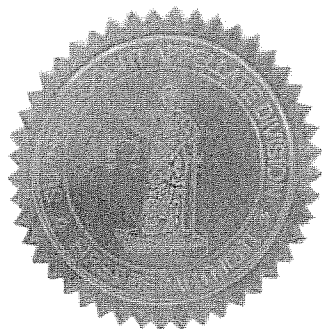
*Appellate Division of the Supreme Court
of the State of New York
First Judicial Department*

I, Susanna M. Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, do hereby certify that

R. James Jude De Rose, III

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on June 7, 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 this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand in the City of New York on September 29, 2022.



Susanna M. Rojas

Clerk of the Court