

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TODD SOKOLOWSKI, Individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

MENU FOODS, INC., MENU FOODS,
MENU FOODS INCOME FUND, and THE
IAMS COMPANY.

Defendants.

CIVIL ACTION NO.: 1:07-CV-01709 NLH -
AMD

(Honorable Noel L. Hillman, U.S.D.J.)

**NOTICE OF MOTION OF DEFENDANT,
THE IAMS COMPANY, FOR
ADMISSION PRO HAC VICE OF
D. JEFFREY IRELAND, ESQ.**

PLEASE TAKE NOTICE, that as soon as may be heard, Gibbons P.C., attorneys for defendant, The Iams Company, shall move before the Court pursuant to Local Civil Rule 101.1(c), for an Order allowing admission of D. Jeffrey Ireland, Esq., *pro hac vice* in the above referenced matter.

PLEASE TAKE FURTHER NOTICE, that the moving party shall rely upon the accompanying Declaration of D. Jeffrey Ireland, Esq.

GIBBONS P.C.

s/ Francis McGill Hadden

Francis McGill Hadden (FH-4564)

1700 Two Logan Square

18th & Arch Streets

Philadelphia, PA 19103

(T) 215/446-6231 (Direct)

(F) 215/446-6314 (Direct)

Attorneys for Defendant, The Iams Company

Dated: June 22, 2007

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

TODD SOKOLOWSKI, Individually and on
behalf of all others similarly situated,

Plaintiffs,

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MENU FOODS, INC., MENU FOODS,
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AMD

(Honorable Noel L. Hillman, U.S.D.J.)

**MOTION OF DEFENDANT, THE IAMS
COMPANY, FOR ADMISSION PRO HAC
VICE OF D. JEFFREY IRELAND, ESQ.**

Defendant, The Iams Company, by their attorneys, Gibbons P.C., hereby moves this Honorable Court for an Order admitting D. Jeffrey Ireland, Esq., *pro hac vice* to serve as co-counsel for The Iams Company in the above-captioned matter, and in support thereof avers as follows:

1. The undersigned is a partner at the law firm of Gibbons P.C., counsel for defendant, The Iams Company, in the above-captioned matter and is a member in good standing of the bar of the State of New Jersey and the United States District Court for the District of New Jersey.

2. D. Jeffrey Ireland, Esq. is a partner in the law firm of Faruki, Ireland & Cox P.L.L, 500 Courthouse Plaza, SW10 North Ludlow Street, Dayton, OH 45402. See Declaration of D. Jeffrey Ireland, Esq., attached hereto as Exhibit "A."

3. Mr. Ireland is a member in good standing of the Bar of the State of Ohio. Mr. Ireland has also been admitted to practice in the following:

- Ohio Supreme Court (Columbus)
Admitted: November 7, 1980
- United States District Court for the Southern District of Ohio (Dayton)
Admitted: December 9, 1980
- United States Supreme Court (Washington, D.C.)
Admitted: March 28, 1988
- United States Court of Appeals for the Seventh Circuit (Chicago)
Admitted: June 26, 1992
- United States Court of Appeals for the Ninth Circuit (Los Angeles)
Admitted March 1, 1996
- United States Court of Appeals for the Eighth Circuit (St. Louis, Missouri)
Admitted: July 29, 1997

See Declaration of D. Jeffrey Ireland, Esq., attached hereto as Exhibit "A."

4. Mr. Ireland has never been convicted of a crime, censured, suspended, disciplined or disbarred by any court, nor does Mr. Ireland have any disciplinary or contempt proceedings involving him pending before any court, nor has Mr. Ireland been denied admission to any court during the last five years. See Declaration of D. Jeffrey Ireland, Esq., attached hereto as Exhibit "A."

5. The purpose of this application is to make it possible for Mr. Ireland to represent defendant, The Iams Company, who has sought his firm's advice and assistance with respect to this litigation. See Declaration of D. Jeffrey Ireland, Esq., attached hereto as Exhibit "A."

6. If Mr. Ireland is permitted to participate in this action, he will strictly observe the rules of this Court and any deadlines assigned for discovery, pre-trial motions, pre-trial

conferences and trial. He will also abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Code of Professional Responsibility.

7. The undersigned respectfully requests, on behalf of the defendant, The Iams Company, that Mr. Ireland be admitted *pro hac vice* to practice before this Court and to participate in all matters on behalf of defendant, The Iams Company, in this action. The undersigned recommends such admission without reservation.

8. Gibbons P.C. will remain local counsel for defendant, The Iams Company, if Mr. Ireland is granted *pro hac vice* admission. The undersigned or another member of Gibbons P.C. who is a member in good standing of the bar of the State of New Jersey and the United States District Court for the District of New Jersey will sign all pleadings filed with the Court on behalf of plaintiffs in this matter and will be present for all appearances before the Court.

WHEREFORE, defendant, The Iams Company, respectfully requests that this Honorable Court admit D. Jeffrey Ireland, Esq., to practice before this Court *pro hac vice* in this action.

GIBBONS P.C.

s/ Francis McGill Hadden
Francis McGill Hadden (FH-4564)
1700 Two Logan Square
18th & Arch Streets
Philadelphia, PA 19103
(T) 215/446-6231 (Direct)
(F) 215/446-6314 (Direct)
Attorneys for Defendant, The Iams Company

Dated: June 22, 2007

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DISTRICT OF NEW JERSEY

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behalf of all others similarly situated,

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AMD

(Honorable Noel L. Hillman, U.S.D.J.)

**ORDER GRANTING ADMISSION
PRO HAC VICE OF
D. JEFFREY IRELAND, ESQ.**

THIS MATTER having been presented to the Court upon the application of Gibbons P.C., attorneys for defendant, The Iams Company, for the entry of an Order admitting D. Jeffrey Ireland, Esq., as counsel pro hac vice pursuant to Local Civil Rule 101.1(c) in the within matter, and for good cause shown;

IT IS on this ___ day of _____, 2007,

ORDERED that D. Jeffrey Ireland, Esq. be and is hereby granted admission *pro hac vice* to speak for and participate on behalf of defendant, The Iams Company, in the defense of this matter in the same manner as attorneys authorized to practice law in this State; and

IT IS FURTHER ORDERED that D. Jeffrey Ireland, Esq. shall abide by the provisions of the New Jersey Court Rules including all disciplinary rules, and shall also specifically comply with the provisions of R. 1:21-2, R. 1:20-1(b) (payment annually to the Oversight Committee), and R. 1:28-2 (payment annually to the New Jersey Lawyers' Fund for Client Protection), during the time of their *pro hac vice* admission; and

IT IS FURTHER ORDERED that D. Jeffrey Ireland, Esq. shall make a \$150.00 payment to the Clerk of the Court of the District of New Jersey in accordance with Local Rule 101(c)(3); and

IT IS FURTHER ORDERED that D. Jeffrey Ireland, Esq., shall notify the Court immediately of any matter affecting their standing as members of the bar of any other Court; and

IT IS FURTHER ORDERED that all pleadings, briefs and any other papers filed with the Court in this matter be signed by an attorney of record authorized to practice in this State, who will be held responsible for said counsel in the conduct of this cause and of the attorneys admitted by the terms of this Order.

Honorable Noel L. Hillman, U.S.D.J.

EXHIBIT "A"

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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(Honorable Noel L. Hillman, U.S.D.J.)

**DECLARATION OF D. JEFFREY
IRELAND IN SUPPORT OF MOTION
FOR ADMISSION PRO HAC VICE**

I, D. JEFFREY IRELAND, declare as follows:

1. I am a partner in the law firm of Faruki, Ireland & Cox P.L.L, 500 Courthouse Plaza, S.W., 10 North Ludlow Street Dayton, Ohio 45402.

2. I am a member in good standing of the Bar of the State of Ohio and have been admitted to practice in the following:

- Ohio Supreme Court (Columbus)
Admitted: November 7, 1980
- United States District Court for the
Southern District of Ohio (Dayton)
Admitted: December 9, 1980
- United States Court of Appeals for the
Sixth Circuit (Cincinnati)
Admitted: December 9, 1980
- United States Supreme Court (Washington, D.C.)
Admitted: March 28, 1988

- United States Court of Appeals for the Seventh Circuit (Chicago)
Admitted: June 26, 1992
- United States Court of Appeals for the Ninth Circuit Court (Los Angeles)
Admitted: March 1, 1996
- United States Court of Appeals for the Eighth Circuit (St. Louis, Missouri)
Admitted: July 29, 1997

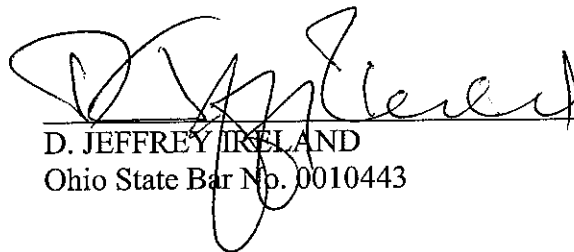
3. I have never been convicted of a crime, censured, suspended, disciplined or disbarred by any court; nor do I have any disciplinary or contempt proceedings involving me pending before any court, nor have I been denied admission to any court during the last five years.

4. The purpose of this application is to make it possible for me to represent defendant, The Iams Company, who has sought this firm's advice and assistance with respect to this litigation.

5. If permitted to participate in this action, I will strictly observe the rules of this Court and any deadlines assigned for discovery, pre-trial motions, pre-trial conferences and trial. I will also abide by the ethical standards governing the practice of law in this Court pursuant to the New Jersey State Lawyer's Code of Professional Responsibility.

6. For the foregoing reasons, I respectfully request that this Court admit me *pro hac vice* in the above-entitled action.

7. Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury that the foregoing is true and correct.



D. JEFFREY IRELAND
Ohio State Bar No. 0010443

Dated: 6/21/07

184703.1

CERTIFICATE OF SERVICE

Francis McGill Hadden, Esquire, counsel for Defendant, The Iams Company, certifies that on this 22nd day of June, 2007, he caused a true and correct copy of the attached Notice of Motion of Defendant, The Iams Company, for Admission Pro Hac Vice of D. Jeffrey Ireland, Esquire, Motion, Order granting Admission and Exhibit "A", Declaration of D. Jeffrey Ireland in Support of Motion for Admission Pro Hac Vice to be electronically served upon the following:

Joseph J. DePalma, Esquire
Katrina Blumenkrants, Esquire
Lite DePalma Greenberg & Rivas, LLC
Two Gateway Center, 12th Floor
Newark, NJ 07102

Bruce E. Newman, Esquire
Kevin E. Creed, Esquire
Newman, Creed & Associates
99 North 9th Street, Rte. 6
P. O. Box 575
Bristol, CT 06011-0575

GIBBONS P.C.

By: s/ Francis McGill Hadden