

**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
BRIAN D. WRIGHT, 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 Brian D. Wright, Esq., *pro hac vice* in the above referenced matter.

PLEASE TAKE FURTHER NOTICE, that the moving party shall rely upon the accompanying Declaration of Brian D. Wright, 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)

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Attorneys for Defendant, The Iams Company

Dated: June 22, 2007

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DISTRICT OF NEW JERSEY

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

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

Defendant, The Iams Company, by their attorneys, Gibbons P.C., hereby moves this Honorable Court for an Order admitting Brian D. Wright, 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 in 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. Brian D. Wright, Esq. is an associate in the law firm of Faruki, Ireland & Cox P.L.L, 500 Courthouse Plaza, SW10 North Ludlow Street Dayton, OH 45402. See Declaration of Brian D. Wright, Esq., attached hereto as Exhibit "A."

3. Mr. Wright is a member in good standing of the Bar of the State of Ohio and has been admitted to practice in the Supreme Court of Ohio, the United States District Court for the

United States Supreme Court. See Declaration of Brian D. Wright, Esq., attached hereto as Exhibit "A."

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

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

6. If Mr. Wright 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. Wright 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. Wright 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 Brian D. Wright, 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)

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Attorneys for Defendant, The Iams Company

Dated: June 22, 2007

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AMD

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

**ORDER FOR ADMISSION
PRO HAC VICE OF
BRIAN D. WRIGHT, 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 Brian D. Wright, 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 Brian D. Wright, 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 Brian D. Wright, 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 Brian D. Wright, 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 Brian D. Wright, 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 BRIAN D.
WRIGHT IN SUPPORT OF MOTION
FOR ADMISSION PRO HAC VICE**

I, BRIAN D. WRIGHT, declare as follows:

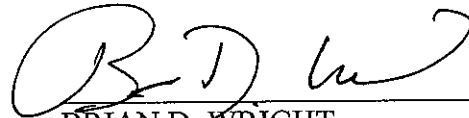
1. I am an attorney in the law firm of Faruki, Ireland & Cox P.L.L, 500 Courthouse Plaza, S.W., 10 North Ludlow Street Dayton, Ohio 45402.
2. I am a member in good standing of the Bar of the State of Ohio and have been admitted to practice in the following: the Supreme Court of Ohio, the United States District Court for the Southern District of Ohio, the United States Court of Appeals for the Sixth Circuit, and the United States Supreme Court.
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.



BRIAN D. WRIGHT
Ohio State Bar No. 0075359

Dated: 6/21/07

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 Brian D. Wright, Esquire, Motion, Order granting Admission and Exhibit "A", Declaration of Brian D. Wright 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