

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

CIVIL ACTION NO.: 06-CV-688 (DMC)

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DEBORAH FELLNER,)
Individually and on Behalf of Those)
Similarly Situated,)
)
Plaintiffs,)
)
v.)
)
TRI-UNION SEAFOODS, L.L.C.,)
d/b/a CHICKEN OF THE SEA,)
)
Defendant.)
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**AFFIRMATION OF SCOTT H. GOLDSTEIN IN SUPPORT OF MOTION FOR PRO
HAC VICE ADMISSION OF JOHN A. KIERNAN, ESQ.**

Scott H. Goldstein, an attorney duly admitted to practice in the United States District Court, District of New Jersey, hereby affirms the truth of the following statements under the penalties of perjury.

1. I am an associate with the law firm of Bonner Kiernan Trebach & Crociata, LLP attorneys for defendant Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea in the above entitled matter and as such am fully familiar with the facts and circumstances herein contained. The source of my knowledge are the records and files maintained by my office in the course of handling this matter.

2. I am a member in good standing of the bar of the state of New Jersey, as well as the United States District Court, District of New Jersey.

3. This Affirmation is respectfully submitted in support of the instant Motion for an Order permitting John Kiernan, Esq. to appear before this Court *pro hac vice* for the purpose of representing Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea in the above captioned matter.

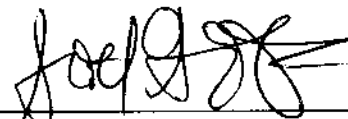
4. John Kiernan, Esq. is a Partner with the law firm of Bonner Kiernan Trebach & Crociata, LLP in Boston, Massachusetts. Mr. Kiernan has a long-standing familiarity with the subject matter and legal issues presented in this litigation and has been asked by Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea to represent it in this litigation.

5. John Kiernan, Esq. is admitted and in good standing with the bar of the State of Massachusetts. Please see Affidavit of John Kiernan filed herewith.

6. Because of the longstanding familiarity with the issues presented in this litigation, and because of Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea's specific request that Mr. Kiernan work on this matter, the representation of defendant Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea. in this action would be substantially enhanced by the admission *pro hac vice* of attorney Kiernan in the above captioned matter.

WHEREFORE, defendant Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea respectfully requests that this Honorable Court enter an Order admitting *pro hac vice* John Kiernan, Esq. for the limited purpose of representing Tri-Union Seafoods, L.L.C. d/b/a Chicken of the Sea in the above captioned matter.

Dated: April 5, 2006



Scott H. Goldstein, Esq.