

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

PARTS GEEK, LLC,

Plaintiff,

v.

U.S. AUTO PARTS NETWORK, INC. and  
GOOGLE, INC.

Defendants.

C.A. No. 3:09-cv-05578-MLC-LHG  
Honorable Mary L. Cooper, U.S.D.J.  
Honorable Lois H. Goodman, U.S.M.J.

**ORDER**

This matter having come before the Court upon Google, Inc.'s Motion for an Order allowing Ozan O. Varol, Esquire, to appear and participate *pro hac vice*; and the Court having considered the moving papers; and for good cause shown pursuant to L.Civ.R. 101.1(c);

IT IS this \_\_\_\_ day of \_\_\_\_\_, 2010 hereby

**ORDERED** that Ozan O. Varol, Esquire be permitted to appear *pro hac vice* in the above-captioned matter in the United States District Court for the District of New Jersey pursuant to Local Rule 101.1(c); provided, however, that all pleadings, briefs and other papers filed with the Court shall be signed by Michele Hangle, Esquire, or another member in good standing with the Bar of the Supreme Court of New Jersey and the Bar of this Court, who shall be held responsible for said papers and for the conduct of the case, and who shall be present before the Court during all phases of this proceeding, unless expressly excused by the Court, as well as be held responsible for the conduct of the attorney admitted *pro hac vice* pursuant to this Order; and it is further

**ORDERED** that, pursuant to L. Civ. R. 101.1(c)(2), Mr. Varol shall pay the annual fee to the New Jersey Lawyer's Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order; and it is further

**ORDERED** that, pursuant to L. Civ. R. 101.1(c)(3), Mr. Varol shall make a payment of \$150.00, payable to the Clerk, United States District Court; and it is further

**ORDERED** that Mr. Varol shall be bound by the General and Admiralty Rules of the United States District Court for the District of New Jersey, including but not limited to the provisions of Local Rule 103.1, Judicial Ethics and Professional Responsibility, and Local Rule 104.1, Discipline of Attorneys; and it is further

**ORDERED** that, pursuant to L. Civ. R. 101.1(c)(4), Mr. Varol shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey Court Contingency Fee Rule, Rule 1:21-7, as amended.

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, J.

HANGLEY ARONCHICK SEGAL & PUDLIN  
Michele D. Hangley (MH0373)  
Dylan J. Steinberg (DS7855)  
20 Brace Road, Suite 201  
Cherry Hill, NJ 08034  
(856) 616-2100  
Attorneys for Google Inc.

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**NOTICE OF UNOPPOSED MOTION  
FOR *PRO HAC VICE* ADMISSION OF  
OZAN O. VAROL, ESQUIRE**

PLEASE TAKE NOTICE that on February 16, 2010 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Google Inc. will move in the United States District Court of New Jersey for an Order pursuant to L.Civ.R. 7.1(d) and 101.1(c) granting admission *pro hac vice* to Ozan O. Varol, Esquire of the law firm of Kecker & Van Nest, LLP for the purpose of appearing, participating, and representing Google in this action.

In support of the Motion, Google will rely upon the Certifications of Mr. Varol and of Michele D. Hangle, Esquire, which are attached hereto. A proposed form of Order accompanies this Motion.

HANGLEY ARONCHICK SEGAL & PUDLIN

By: /s/ Michele D. Hangle  
Michele D. Hangle (MH0373)  
Dylan J. Steinberg (DS7855)  
20 Brace Road, Suite 201  
Cherry Hill, NJ 08034  
(856) 616-2100

Attorneys for Google Inc.

Dated: January 13, 2010

**HANGLEY ARONCHICK SEGAL & PUDLIN**  
**Michele D. Hangley (MH0373)**  
**Dylan J. Steinberg (DS7855)**  
**20 Brace Road, Suite 201**  
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**CERTIFICATION OF OZAN O.  
VAROL IN SUPPORT OF MOTION  
FOR *PRO HAC VICE* ADMISSION**

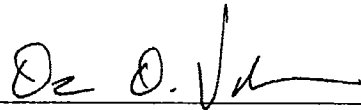
I, Ozan O. Varol, in lieu of oath or affidavit, certify that:

1. I am an attorney with the law firm of Keker & Van Nest, LLP, and I have been retained by Google Inc. to represent it in the above-captioned action.
2. I have been admitted to practice before the bars of the Supreme Court of California, the United States District Court for the Northern District of California, and the United States Court of Appeals for the Ninth Circuit. I am a member in good standing in each of those bars.
3. I am associated in this matter with Michele D. Hangley, Esquire, a member of Hangley Aronchick Segal & Pudlin, New Jersey counsel of record qualified to practice pursuant to L.Civ.R. 101.1(b). The firm's New Jersey office is located at 20 Brace Road, Suite 201, Cherry Hill, New Jersey 08034.

4. I am not under suspension or disbarment by any court.
5. No disciplinary proceedings are pending against me in any jurisdiction, and no discipline has previously been imposed on me by any jurisdiction.
6. Google has requested that I represent it in connection with this matter.
7. I will comply with all the requirements of the rules of this Court, such as the rules requiring a member of the bar of this Court to sign and file papers; all disciplinary rules; L.Civ.R. 101.1(c)(2), requiring payment pursuant to New Jersey Court Rule 1:28-2 (payment into the Lawyers' Fund for Client Protection); and L.Civ.R. 101.1(c)(3), requiring payment of \$150.00 to the Clerk of this Court.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 7, 2010

  
\_\_\_\_\_  
Ozan O. Varol

**HANGLEY ARONCHICK SEGAL & PUDLIN**  
**Michele D. Hangley (MH0373)**  
**Dylan J. Steinberg (DS7855)**  
**20 Brace Road, Suite 201**  
**Cherry Hill, NJ 08034**  
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Honorable Lois H. Goodman, U.S.M.J.

**CERTIFICATION OF MICHELE D.  
HANGLEY, ESQUIRE IN SUPPORT  
OF MOTION FOR *PRO HAC VICE*  
ADMISSION OF OZAN O. VAROL,  
ESQUIRE**

I, Michele D. Hangley, in lieu of oath or affidavit, certify that:

1. I am an attorney with the law firm of Hangley Aronchick Segal & Pudlin, attorneys for Google Inc. in the present action. Hangley Aronchick Segal & Pudlin maintains a New Jersey office at 20 Brace Road, Suite 201, Cherry Hill, New Jersey 08034.
2. I am a member in good standing of the bar of the State of New Jersey and of the bar of the United States District Court for the District of New Jersey.
3. I am currently counsel of record in this matter and agree to continue to serve as counsel on behalf of Google and to comply with all the requirements of the rules of this Court, such as the rules requiring a member of the bar of this Court to sign and file papers.

4. Counsel for plaintiff Parts Geek, LLC and co-defendant U.S. Auto Parts Network, Inc. have authorized me to represent that they do not oppose this motion.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 13, 2010

/s/ Michele D. Hangley  
Michele D. Hangley



HANGLEY ARONCHICK SEGAL & PUDLIN  
Michele D. Hangley (MH0373)  
Dylan J. Steinberg (DS7855)  
20 Brace Road, Suite 201  
Cherry Hill, NJ 08034  
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**STATEMENT PURSUANT TO  
L.Civ.R. 7.1(d)(4) THAT NO  
BRIEF IS NECESSARY**

Google Inc. hereby submits its Motion for *Pro Hac Vice* Admission of Ozan O. Varol, Esquire without a Memorandum of Law in support thereof. A Memorandum of Law is not required because Google is relying upon the Certifications of Mr. Varol and of Michele D. Hangley, Esquire, which establish that Mr. Varol should be admitted *pro hac vice* pursuant to L.Civ.R. 101.1(c).

Respectfully submitted,

HANGLEY ARONCHICK SEGAL & PUDLIN

By: /s/ Michele D. Hangley  
Michele D. Hangley (MH0373)  
Dylan J. Steinberg (DS7855)  
20 Brace Road, Suite 201  
Cherry Hill, NJ 08034  
(856) 616-2100

Attorneys for Google Inc.

Dated: January 13, 2010

**CERTIFICATION OF SERVICE**

I hereby certify that, on this 13th day of January, 2010, a true and correct copy of the foregoing Motion for *Pro Hac Vice* Admission with annexed Certifications, proposed form of Order, and Statement Pursuant to L.Civ.R.7.1(d)(4) that No Brief is Necessary was filed electronically and served electronically upon all counsel of record.

/s/ Michele D. Hangley \_\_\_\_\_  
Michele D. Hangley