

Scott A. Resnik (SR-4740)
KATTEN MUCHIN ROSENMAN LLP
575 Madison Avenue
New York, NY 10022
(212) 940-8800

IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ OCT 12 2010 ★

Attorneys for Respondents
*Guarantee Trust Life Insurance Company, Century
Senior Services, and Vantage America Solutions, Inc.*

BROOKLYN OFFICE

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

RECEIVED
10/8/10
Chambers of
I. Leo Glasser
U.S.D.J.

FEDERAL TRADE COMMISSION

Civ. No. 10-cv-03551-ILG

Plaintiff,

-against-

CONSUMER HEALTH BENEFITS ASSOCIATION,
organized as a Missouri not-for-profit, also doing
Business as CHBA,

NATIONAL ASSOCIATION FOR AMERICANS,
organized as a Missouri not-for-profit, also doing
Business as NAFA,

NATIONAL BENEFITS CONSULTANTS, LLC, a
Florida limited liability company, also doing business
as NBC,

NATIONAL BENEFIT SOLUTIONS, LLC, a Florida
limited liability company, also doing business as NBS,

LOUIS LEO, individually, as a Managing Member of
NATIONAL BENEFITS CONSULTANTS, LLC, as a
Managing Member of NATIONAL BENEFIT
SOLUTIONS, LLC, and as the Vice President and
Treasurer of CONSUMER HEALTH BENEFITS
ASSOCIATION,

RON WERNER, individually, as Managing Member of
NATIONAL BENEFITS CONSULTANTS, LLC, as a
Managing Member of NATIONAL BENEFIT
SOLUTIONS, LLC, and as President and Managing
Partner of CONSUMER HEALTH BENEFITS
ASSOCIATION, and

RITA WERNER, individually, as Senior Vice President
and Director of Operations of CONSUMER HEALTH
BENEFITS ASSOCIATION,

Defendants.

**NOTICE OF MOTION TO
ADMIT GIL M. SOFFER
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the attached Affidavit of Scott A. Resnik dated October 8, 2010 and the exhibits attached thereto, and upon all prior pleadings and proceedings had herein, Respondents Guarantee Trust Life Insurance Company, Century Senior Services, and Vantage America Solutions, Inc., will move this Court before the Honorable Israel Leo Glasser, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, for an Order pursuant to Rule 1.3(c) of the Local Civil Rules of this Court, allowing the admission *pro hac vice* of:

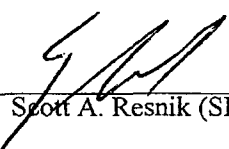
Gil M. Soffer
KATTEN MUCHIN ROSENMAN LLP
525 W. Monroe Street
Chicago, IL 60661
Tel: (312) 902-5474
Fax: (312) 577-8950
gil.soffer@kattenlaw.com

Gil Soffer is a partner of the law firm Katten Muchin Rosenman LLP and a member in good standing of the Bars of the States of California and Illinois, the United States Courts of Appeals for the Seventh and Ninth Circuits, and the United States District Courts for the Northern District of Illinois and the Northern District of California. There are no pending disciplinary proceedings against Mr. Soffer in any state or federal court.

Dated: New York, New York
October 8, 2010

KATTEN MUCHIN ROSENMAN LLP

By: _____


Scott A. Resnik (SR-4740)

575 Madison Avenue
New York, NY 10022
Tel: (212) 940-8800
Fax: (212) 940-8776

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Attorneys for Respondents
Guarantee Trust Life Insurance Company,
Century Senior Services, and Vantage
America Solutions, Inc.

Served on:

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Attorneys for Respondents
*Guarantee Trust Life Insurance Company, Century
Senior Services, and Vantage America Solutions, Inc.*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION

Plaintiff,

-against-

CONSUMER HEALTH BENEFITS ASSOCIATION,
organized as a Missouri not-for-profit, also doing
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NATIONAL BENEFITS CONSULTANTS, LLC, a
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Partner of CONSUMER HEALTH BENEFITS
ASSOCIATION, and

RITA WERNER, individually, as Senior Vice President
and Director of Operations of CONSUMER HEALTH
BENEFITS ASSOCIATION,

Defendants.

Civ. No. 10-cv-03551-ILG

**AFFIDAVIT OF SCOTT A.
RESNIK IN SUPPORT OF
ADMISSION OF GIL M.
SOFFER PRO HAC VICE**

STATE OF NEW YORK)
 ss.:
COUNTY OF NEW YORK)

SCOTT A. RESNIK, being duly sworn, hereby deposes and says:

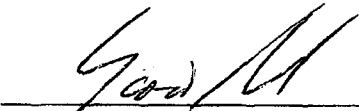
1. I am a partner of the law firm Katten Muchin Rosenman LLP, counsel for Respondents Guarantee Trust Life Insurance Company, Century Senior Services, and Vantage America Solutions, Inc. (collectively, "Respondents") in the above-captioned action. I am familiar with the proceedings in this case. I submit this affidavit in support of Respondents' motion, pursuant to Rule 1.3(c) of the Local Rules of this Court, for admission of Gil M. Soffer to the Bar of this Court *pro hac vice*.

2. I am a member in good standing of the Bars of the States of New Jersey and New York, and was admitted to practice law in 1996. I am also admitted to the Bars of the United States Court of Appeals for the Second Circuit, United States District Court for the Northern, Southern and Eastern Districts of New York, and the United States District Court for the District of New Jersey. I am in good standing with this Court.

3. Mr. Soffer is a partner of Katten Muchin Rosenman LLP, which has offices at 525 W. Monroe Street, Chicago, IL 60661. I believe that he is of, and will act with, the highest integrity. Mr. Soffer is a member in good standing of the Bars of the States of California and Illinois, the United States Courts of Appeals for the Seventh and Ninth Circuits, and the United States District Courts for the Northern District of Illinois and the Northern District of California.

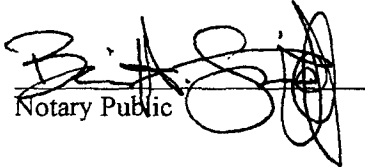
4. Attached hereto as Exhibit "A" is an affidavit from Mr. Soffer and Certificates from the State Bars of the States of California and Illinois reflecting that Mr. Soffer is an active member in good standing of those Bars.

5. Accordingly, I respectfully request that this Court enter an order admitting Gil M. Soffer *pro hac vice* to the Bar of this Court. Attached hereto as Exhibit "B" is a proposed Order granting Mr. Soffer's admission.



Scott A. Resnik

Sworn to before me this
8th day of October 2010



Notary Public

BRIAN A. SCHMIDT
NOTARY PUBLIC, STATE OF NEW YORK
NO.02SC6194787
QUALIFIED IN NEW YORK COUNTY
COMMISSION EXPIRES 10/14/2012

EXHIBIT "A"

KATTEN MUCHIN ROSENMAN LLP
575 Madison Avenue
New York, NY 10022
(212) 940-8800

Attorneys for Respondents
*Guarantee Trust Life Insurance Company, Century
Senior Services, and Vantage America Solutions, Inc.*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION

Plaintiff,

-against-

CONSUMER HEALTH BENEFITS ASSOCIATION,
organized as a Missouri not-for-profit, also doing
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SOLUTIONS, LLC, and as the Vice President and
Treasurer of CONSUMER HEALTH BENEFITS
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Partner of CONSUMER HEALTH BENEFITS
ASSOCIATION, and

RITA WERNER, individually, as Senior Vice President
and Director of Operations of CONSUMER HEALTH
BENEFITS ASSOCIATION,

Defendants.

Civ. No. 10-cv-03551-ILG

**AFFIDAVIT OF GIL
M. SOFFER IN SUPPORT
OF ADMISSION *PRO*
*HAC VICE***

STATE OF ILLINOIS)
 ss.:
COUNTY OF COOK)

GIL M. SOFFER, being duly sworn, deposes and says:

1. I submit this affidavit in support of the motion that I be permitted to appear *pro hac vice* in this case.

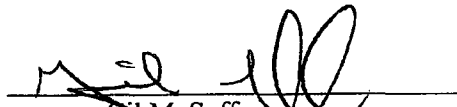
2. I am a partner of the law firm Katten Muchin Rosenman LLP, counsel for Respondents Guarantee Trust Life Insurance Company, Century Senior Services, and Vantage America Solutions, Inc. in the above-captioned action.

3. I am a member in good standing of the Bars of the States of California and Illinois, the United States Courts of Appeals for the Seventh and Ninth Circuits, and the United States District Courts for the Northern District of Illinois and the Northern District of California.

4. Attached hereto are Certificates from the State Bars of the States of California and Illinois reflecting that I am an active member in good standing of those Bars.

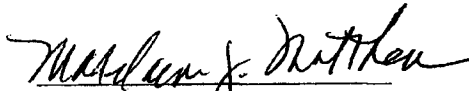
5. There are no disciplinary proceedings pending against me in any jurisdiction nor have I ever been the subject of any disciplinary hearing.

6. I am familiar with the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Eastern District of New York and am willing and able to comply with each of the Rules.

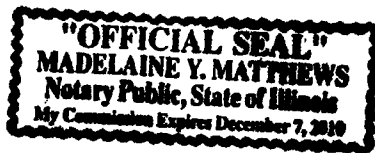


Gil M. Soffer

Sworn to before me this
6 th day of October 2010



Notary Public





Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

GIL MORRIS SOFFER

I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that Gil Morris Soffer was on the 8th day of June 1992 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 5th day of October 2010.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By: _____

A handwritten signature in black ink, appearing to read "Janell", written over a horizontal line.

Janell Hunter, Deputy Clerk

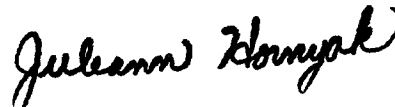
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Gil M. Soffer

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 9, 1989 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Friday, September 24, 2010.



Clerk

EXHIBIT "B"

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION

Plaintiff,

-against-

CONSUMER HEALTH BENEFITS ASSOCIATION,
organized as a Missouri not-for-profit, also doing
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RITA WERNER, individually, as Senior Vice President
and Director of Operations of CONSUMER HEALTH
BENEFITS ASSOCIATION,

Defendants.

Civ. No. 10-cv-03551-ILG

PROPOSED ORDER

Upon motion of Scott A. Resnik of Katten Muchin Rosenman LLP, attorneys for Respondents Guarantee Trust Life Insurance Company, Century Senior Services, and Vantage America Solutions, Inc., and said sponsor's affidavit in support;


IT IS HEREBY ORDERED that

Gil M. Soffer
KATTEN MUCHIN ROSENMAN LLP
525 W. Monroe Street
Chicago, IL 60661
Tel: (312) 902-5474
Fax: (312) 577-8950
gil.soffer@kattenlaw.com

is admitted to this Court, *pro hac vice*, as counsel for Respondents Guarantee Trust Life Insurance Company, Century Senior Services, and Vantage America Solutions, Inc. in the above-captioned case in the United States District Court for the Eastern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including rules governing discipline of attorneys. As this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

ENTERED: *Brooklyn, N.Y.*
October 10, 2010

/S/


Hon. I. Leo Glasser, U.S.D.J.