

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AUTHOR'S GUILD, et al.,  
  
Plaintiff,  
  
-against-  
  
GOOGLE, INC.  
  
Defendants.

05 cv 08136 (DC)  
  
MOTION TO ADMIT COUNSEL  
  
PRO HAC VICE

AUG 31 2009

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Joseph S. Hall, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Applicant's Name: Michael John Guzman  
Firm Name: Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.  
Address: 1615 M Street N.W., Suite 400  
City/State/Zip: Washington, DC 20036  
Phone Number: (202) 326-7900  
Fax Number: (202) 326-7999

Michael John Guzman is a member in good standing of the State Bar in District of Columbia. There are no pending disciplinary proceedings against Michael John Guzman in any state or federal court.

FILED  
DISTRICT COURT  
2009 AUG 31 PM 10:39

Doc. 233

Dated: August 28, 2009  
City, State: Washington, DC

Respectfully submitted,

  
\_\_\_\_\_  
Joseph S. Hall  
SDNY Bar Code: JH-2612  
KELLOGG, HUBER, HANSEN,  
TODD EVANS & FIGEL, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
Tel: (202) 326-7900  
Fax: (202) 326-7999  
jhall@khhte.com

JH 8/28/09 - 608602

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AUTHOR'S GUILD, et al.,

Plaintiff,

-against-

GOOGLE, INC.,

Defendants.

05 cv 08136 (DC)

AFFIDAVIT OF JOSEPH S. HALL IN  
SUPPORT OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE

District of Columbia ) SS:

I, Joseph S. Hall, being duly sworn, hereby deposes and says the following:

1. I am a partner at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., counsel for the Objector's in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Objector's motion to admit Michael J. Guzman as counsel pro hac vice to represent Objector's in this matter.
2. I am a member in good standing of the bar in the State of New York, and was admitted to practice law in October, 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and I am in good standing with this Court.
3. I have known Michael J. Guzman since October, 2001.
4. Michael J. Guzman is a partner at Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
5. I have found Michael J. Guzman to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Michael J. Guzman pro hac vice.
7. I respectfully submit a proposed order granting the admission of Michael J. Guzman, pro hac vice, which is attached hereto as Exhibit A.

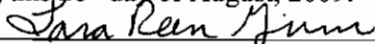
WHEREFORE it is respectfully requested that the motion to admit Michael J. Guzman, pro hac vice, to represent the Objector's in the above captioned matter, be granted.

Respectfully submitted,



Joseph S. Hall  
SDNY Bar Code: JH-2612

Subscribed and Sworn to before me, in my presence, this 28<sup>th</sup> day of August, 2009.



Notary Public, D.C. My commission expires:

6/14/14

TARA REEN GRIM  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires June 14, 2014

## Exhibit A

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

AUTHOR'S GUILD, et al.,

Plaintiff,

-against-

GOOGLE, INC.,

Defendants.

05 cv 08136 (DC)

ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION

Upon the motion of Michael J. Guzman, attorney for Harold Bloom, Elliot Abrams, Charlotte Allen, Phyllis Ammons, Dick Arney, Jacques Barzun, Nicholas A. Basbanes, Stephen Bates, Shawn J. Bayern, Jack Beerman, Michael Behe, Michael Cox, Douglas Crase, Frank Gonzalez-Crussi, Midge Decter, John Derbyshire, The Estate of Thomas M. Disch, Gerald Early, Mel Eisenberg, Richard A. Epstein, Henry Fetter, David D. Friedman, David Gelemter, Gabrielle Glaser, Mary Ann Glendon, Victor Davis Hanson, Robert Herbold, Arthur Herman, Charles Hill, Manuela Hoelterhoff, Richard Howard, Ishmael Jones, Donald Kagan, David Kuo, Michael Ledeen, Susan Lee, Mary Lefkowitz, David Lehman, John Lehman, Howard Markel, Sherwin B. Nuland, Steven Ozment, Michael Perry, Norman Podhoretz, Diane Ravitch, Ralph Reed, Harriet Rubin, Sarah Ruden, Peter Schweizer, Roger Simon, Roy Spencer, Geoffrey R. Stone, Charles Sykes, Terry Teachout, Paco Underhill, Ruth Wisse, Elizabeth Wurtzel, and John Yoo and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that

Applicant's Name:	Michael J. Guzman
Firm Name:	Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C.
Address:	1615 M Street N.W., Suite 400
City/State/Zip:	Washington, DC 20036
Telephone/Fax:	(202) 326-7900 / (202) 326-7999
Email address:	mguzman@khhte.com

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

is admitted to practice pro hac vice as counsel for Harold Bloom, Elliot Abrams, Charlotte Allen, Phyllis Ammons, Dick Armev, Jacques Barzun, Nicholas A. Basbanes, Stephen Bates, Shawn J. Bayern, Jack Beerman, Michael Behe, Michael Cox, Douglas Crase, Frank Gonzalez-Crussi, Midge Decter, John Derbyshire, The Estate of Thomas M. Disch, Gerald Early, Mel Eisenberg, Richard A. Epstein, Henry Fetter, David D. Friedman, David Gelernter, Gabrielle Glaser, Mary Ann Glendon, Victor Davis Hanson, Robert Herbold, Arthur Herman, Charles Hill, Manuela Hoelterhoff, Richard Howard, Ishmael Jones, Donald Kagan, David Kuo, Michael Ledeen, Susan Lee, Mary Lefkowitz, David Lehman, John Lehman, Howard Markel, Sherwin B. Nuland, Steven Ozment, Michael Perry, Norman Podhoretz, Diane Ravitch, Ralph Reed, Harriet Rubin, Sarah Ruden, Peter Schweizer, Roger Simon, Roy Spencer, Geoffrey R. Stone, Charles Sykes, Terry Teachout, Paco Underhill, Ruth Wisse, Elizabeth Wurtzel, and John Yoo in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: \_\_\_\_\_

City, State: \_\_\_\_\_

\_\_\_\_\_  
United States District/Magistrate Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**CERTIFICATE OF SERVICE**

I hereby certify that on the 28th day of August, 2009, I served a true and correct copy of the foregoing document to the party listed below via Federal Express:

David J. Silbert  
Keker & Van Nest, LLP  
710 Sansome Street  
San Francisco, CA 94111



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Joseph S. Hall  
SDNY Bar Code: JH-2612  
KELLOGG, HUBER, HANSEN,  
TODD EVANS & FIGEL, P.L.L.C.  
1615 M Street, N.W., Suite 400  
Washington, D.C. 20036  
Tel: (202) 326-7900  
Fax: (202) 326-7999  
jhall@khhte.com

*Counsel for the Bloom Objectors*



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

MICHAEL J. GUZMAN

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was on the 6<sup>TH</sup> day of FEBRUARY, 1995

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on August 21, 2009.

GARLAND PINKSTON, JR., CLERK

By: *A. Charles*  
Deputy Clerk