

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

The Author's Guild, Associational Plaintiff, :
Herbert Mitgang, Betty Miles, :
Daniel Hoffman, Paul Dickson and Joseph :
Goulden, Individually And On :
Behalf Of All Others Similarly Situated, :

Plaintiffs, :

v. :

Google Inc., :

Defendant :

NO. 05 CV 8136-JES

**NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

The Author's Guild et al v. Google Inc. TO ALL PARTIES AND THEIR COUNSEL OF RECORD

Doc. 43

PLEASE TAKE NOTICE that upon the annexed affidavit of Sanford P. Dumain, a member of the law firm of Milberg Weiss Bershad & Schulman LLP, in support of this motion, and the Certificate of Good Standing annexed thereto, we will move this Court before the Honorable John Sprizzo at the United States Courthouse for the Southern District of New York, 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 for an Order allowing the admission of Hadley Perkins Roeltgen, an associate at the law firm of Kohn, Swift, & Graf, P.C. and a member in good standing of the bar of the Commonwealth of Pennsylvania, as attorney *pro hac vice* to argue or

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try this case in whole or in part as counsel. There are no pending disciplinary proceedings against the applicant in any State or Federal court.

Dated: October 5, 2006

**MILBERG WEISS BERSHAD
& SCHULMAN LLP**



Sanford P. Dumain (SD - 8712)
One Pennsylvania Plaza
New York, New York 10119
Telephone: (212) 594-5300
Facsimile: (212) 868-1229

Attorney for Plaintiff

Sanford P. Dumain
MILBERG WEISS BERSHAD
& SCHULMAN LLP
One Pennsylvania Plaza
New York, NY 10119-0165
Telephone: (212) 594-5300
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

The Author's Guild, Associational Plaintiff, :
Herbert Mitgang, Betty Miles, :
Daniel Hoffman, Paul Dickson and Joseph :
Goulden, Individually And On :
Behalf Of All Others Similarly Situated, :

NO. 05 CV 8136-JES

Plaintiffs, :

**AFFIDAVIT OF SANFORD P. DUMAIN
IN SUPPORT OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

v. :

Google Inc., :

Defendant :

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

I, Sanford P. Dumain, being, being duly sworn, depose and say:

I am an attorney duly admitted to practice before the Courts of the State of New York and before the United States District Court for the Southern District of New York. I am a member of the law firm of Milberg Weiss Bershad & Schulman LLP, counsel for Plaintiffs in this action. I submit this affidavit in support of the Motion to Admit Counsel *Pro Hac Vice* for attorney Hadley Perkins Roeltgen to appear and practice in this Court in this matter on behalf of plaintiff.

Hadley Perkins Roeltgen, of the office of Kohn, Swift, & Graf, P.C., is a member of the bar in good standing in every jurisdiction where she has been admitted to practice. Annexed hereto is a copy of Ms. Roeltgen's Certificate of Good Standing from the Supreme Court of the Commonwealth of Pennsylvania.

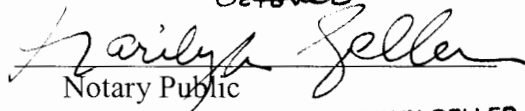
There are no disciplinary proceedings pending against Ms. Roeltgen as member of the bar in any jurisdiction.

Ms. Roeltgen has read and is familiar with the Local Rules of the United States District Court for the Southern District of New York.



Sanford P. Dumain

Sworn to before me this
5th day of ~~September~~^{October}, 2006



Notary Public

MARILYN GELLER
Notary Public, State of New York
No. 01-GE4725644
Qualified in Queens County
Commission Expires Nov 30, 2006



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Hadley Perkins Roeltgen, Esq.

DATE OF ADMISSION

November 4, 2002

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: September 12, 2006

A handwritten signature in cursive script, reading "Patricia A. Nicola".

Patricia A. Nicola

Chief Clerk

ORIGINAL

Sanford P. Dumain
MILBERG WEISS BERSHAD
& SCHULMAN LLP
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New York, NY 10119-0165
Telephone: (212) 594-5300
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

The Author's Guild, Associational Plaintiff, :
Herbert Mitgang, Betty Miles, :
Daniel Hoffman, Paul Dickson and Joseph :
Goulden, Individually And On :
Behalf Of All Others Similarly Situated, :

NO. 05 CV 8136-JES

Plaintiffs, :

**DECLARATION OF HADLEY PERKINS
ROELTGEN IN SUPPORT OF MOTION
FOR ADMISSION PRO HAC VICE**

v. :

Google Inc., :

Defendant :

HADLEY PERKINS ROELTGEN hereby declares as follows:

1. I am a member of the law firm of Kohn, Swift, & Graf, P.C., One South Broad Street, Suite 2100, Philadelphia, PA 19107, telephone number (215) 238-1700.

2. I submit this Declaration in support of my motion for admission to practice *pro hac vice* as counsel to Plaintiffs the Authors Guild, Herbert Mitgang, Betty Miles, Daniel Hoffman, Paul Dickson and Joseph Goulden, individually and on behalf of all others similarly situated in the above-captioned matter, for the purpose of appearing on behalf of Plaintiffs and to try this case in whole or in part on behalf of Plaintiffs.

3. I am a member in good standing of the Bar of the Commonwealth of Pennsylvania, where I was admitted to practice in 2002.

4. Attached hereto is an original certificate of good standing from the Supreme Court of Pennsylvania, issued September 12, 2006.

5. I hereby certify that I have read and am familiar with the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

6. I respectfully request that I be permitted to appear as counsel and *advocate pro hac vice* on behalf of Plaintiffs in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 25, 2006 in Philadelphia, Pennsylvania.


Hadley Perkins Roeltgen

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

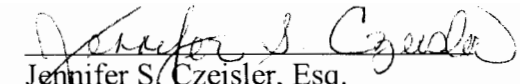
The Authors Guild, Associational Plaintiff,	:	
Herbert Mitgang, Betty Miles and	:	
Daniel Hoffman, Individually And On	:	NO. 05 CV 8136-JES
Behalf Of All Others Similarly Situated,	:	
	:	
Plaintiffs,	:	CERTIFICATE OF SERVICE
	:	
v.	:	
	:	
Google Inc.,	:	
	:	
Defendant	:	

I, Jennifer S. Czeisler, hereby certify that on October 6, 2006, I caused a true and correct copy of the foregoing Notices of Motion to Admit Counsel Hadley Perkins Roeltgen *Pro Hac Vice*, Affidavit of Sanford P. Dumain in Support of Motion to Admit Counsel *Pro Hac Vice*, and [Proposed] Order on Admission to Practice *Pro Hac Vice* via first class mail on the following counsel for Defendant:

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