

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The Author's Guild, et. al.,

1:05cv8136 (DC)

Plaintiffs,

- against -

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

Google, Inc.,

Defendant.

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, Shirley O. Saed, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Charles D. Ossola  
Elaine Metlin  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street NW  
Washington, DC 20006  
Tel: (202) 420-2200  
Fax: (202) 420-2201

and

Victor S. Perlman  
AMERICAN SOCIETY OF MEDIA PHOTOGRAPHERS  
150 North Second Street  
Philadelphia, PA 19106  
Tel: (215) 451-2767  
Fax: (215) 451-0880

Charles D. Ossola is a member of good standing of the Bar of the States of Virginia and of the District of Columbia Court of Appeals.

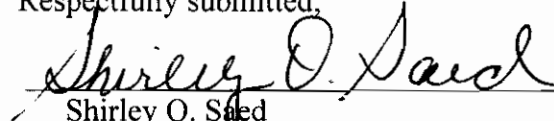
Elaine Metlin is a member in good standing of the Bar of the States of Maryland and District of Columbia Court of Appeals.

Victor S. Perlman is a member of good standing of the Bar of the States of Pennsylvania and New York.

There are no pending disciplinary proceedings against Charles D. Ossola, Elaine Metlin or Victor S. Perlman in any State or Federal court.

Dated: September 11, 2009  
New York, New York

Respectfully submitted,

A handwritten signature in cursive script, reading "Shirley O. Saed", is written over a horizontal line.

Shirley O. Saed  
SDNY Bar #2894SS  
DICKSTEIN SHAPIRO LLP  
1633 Broadway  
New York, NY 10019  
Tel: (212) 277-6687  
Fax: (917) 591-7505

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The Author's Guild, et. al.,

1:05cv8136 (DC)

Plaintiffs,

- against -

Google, Inc.,

**AFFIDAVIT OF SHIRLEY O SAED  
IN SUPPORT OF MOTION TO  
ADMIT COUNSEL PRO HAC VICE**

Defendant.

State of New York     )  
                                  )     ss:  
County of New York    )

Shirley O. Saed, Esq., being duly sworn, hereby deposes and says as follows:

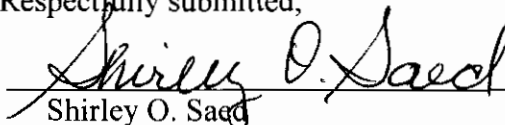
1. I am the Managing Attorney at Dickstein Shapiro LLP, counsel for Objectors The American Society Of Media Photographers, Inc., Graphic Artists Guild, The Picture Archive Council Of America, The North American Nature Photography Association, and Individual Photographers Joel Meyerowitz, Dan Budnik, Peter Turner and Lou Jacobs, Jr. ("Objectors") to the Proposed Settlement 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 Objectors' motion to admit Charles D. Ossola, Elaine Metlin and Victor S. Perlman as counsel pro hac vice to represent Objectors in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law on March 13, 2000. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Charles D. Ossola since March, 2008, Elaine Metlin since April, 2006, and Victor S. Perlman has been the General Counsel and Managing Director of the American Society of Media Photographers, Inc., since February, 1996, which has been a client of Charles D. Ossola for twenty years.
4. Mr. Ossola and Ms. Metlin are Partners at Dickstein Shapiro LLP. Mr. Perlman is the General Counsel and Managing Director of the American Society of Media Photographers.
5. I have found Mr. Ossola, Ms. Metlin and Mr. Perlman to be skilled attorneys and persons of integrity. They are all experienced in Federal practice and are familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Charles D. Ossola, Elaine Metlin and Victor S. Perlman, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Charles D. Ossola, Elaine Metlin and Victor S. Perlman, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Charles D. Ossola, Elaine Metlin and Victor S. Perlman, pro hac vice, to represent Objectors in the above-captioned matter to be granted.

Dated: September 11, 2009  
New York, New York

Respectfully submitted,

A handwritten signature in cursive script, reading "Shirley O. Saad", written over a horizontal line.

Shirley O. Saad  
SDNY Bar #2894SS  
DICKSTEIN SHAPIRO LLP  
1633 Broadway  
New York, NY 10019  
Tel: (212) 277-6687  
Fax: (917) 591-7505

**CERTIFICATE OF GOOD STANDING**

**CHARLES D. OSSOLA**



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

CHARLES D. OSSOLA

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was on the 17<sup>TH</sup> day of DECEMBER, 1979  
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  
September 2, 2009.

GARLAND PINKSTON, JR., CLERK

By: M. Charles  
Deputy Clerk

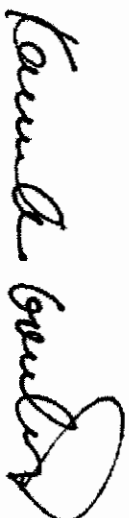


## VIRGINIA STATE BAR

### CERTIFICATE OF GOOD STANDING

THIS IS TO CERTIFY THAT CHARLES DANIEL OSSOLA IS AN ACTIVE MEMBER OF THE VIRGINIA STATE BAR  
IN GOOD STANDING. MR. OSSOLA WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON SEPTEMBER 22, 1978,  
AFTER SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.

Issued September 2, 2009

  
KAREN A. GOULD  
EXECUTIVE DIRECTOR AND  
CHIEF OPERATING OFFICER

**CERTIFICATE OF GOOD STANDING**

**ELAINE METLIN**





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

ELAINE METLIN

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was on the 15<sup>TH</sup> day of JULY, 1985  
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  
September 2, 2009.

GARLAND PINKSTON, JR., CLERK

By: W. Charles  
Deputy Clerk

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the eighteenth day of January, 1985,*

**Elaine Metlin**

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

**In Testimony Whereof,** *I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
third day of September, 2009.*

*Bessie M. Decker*

*Clerk of the Court of Appeals of Maryland*

**CERTIFICATE OF GOOD STANDING**

**VICTOR S. PERLMAN**



Supreme Court of Pennsylvania

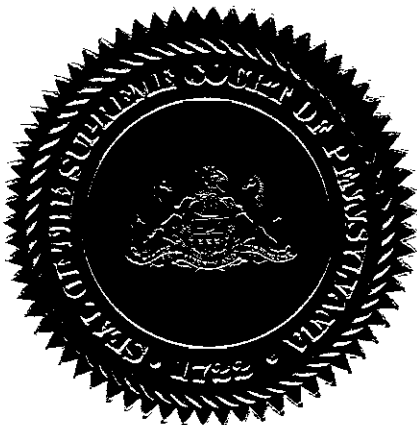
**CERTIFICATE OF GOOD STANDING**

***Victor S. Perlman, Esq.***

**DATE OF ADMISSION**

***October 2, 1972***

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 2, 2009**

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

Patricia A. Johnson  
Chief Clerk



*State of New York*  
*Supreme Court, Appellate Division*  
*Third Judicial Department*

*I, Michael J. Novack, Clerk of the Appellate Division of the  
Supreme Court of the State of New York, Third Judicial Department, do  
hereby certify that*

*Victor Sigmund Perlman*

*having taken and subscribed the Constitutional Oath of Office as prescribed by  
law, was duly licensed and admitted to practice by this Court as an Attorney  
and Counselor at Law in all courts of the State of New York on the 28th day  
of February, 1995, is currently in good standing and is registered with the  
Administrative Office of the Courts as required by section four hundred sixty-  
eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand  
and affixed the Seal of said Court, at the  
City of Albany, this 3rd day of  
September, 2009.*



*Michael J. Novack*  
\_\_\_\_\_  
*Clerk*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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The Author's Guild, et. al.,

1:05cv8136 (DC)

Plaintiffs,

- against -

Google, Inc.,

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Defendant.

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Upon the motion of Shirley O. Saed, Esq., attorney for Objectors: The American Society Of Media Photographers, Inc., Graphic Artists Guild, The Picture Archive Council Of America, The North American Nature Photography Association and Individual Photographers Joel Meyerowitz, Dan Budnik, Peter Turner and Lou Jacobs, Jr. ("Objectors") and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Charles D. Ossola  
Elaine Metlin  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street NW  
Washington, DC 20006  
Tel: (202) 420-2200  
Fax: (202) 420-2201

and

Victor S. Perlman  
AMERICAN SOCIETY OF MEDIA PHOTOGRAPHERS  
150 North Second Street  
Philadelphia, PA 19106  
Tel: (215).451-2767  
Fax: (215)451-0880

are admitted to practice pro hac vice as counsel for Objectors 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: September 11, 2009  
New York, New York

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United States District/Magistrate Judge

**CERTIFICATE OF SERVICE**

I, Shirley O. Saed, Esq., do hereby certify that on September 15, 2009, I did serve a true and correct copy of the attached Motion to Admit Counsel Pro Hac Vice, Affidavit of Shirley O. Saed in Support, and Proposed Order, in the afore-mentioned matter upon the following individuals via electronic mail:

Adam Howard Charnes: [acharnes@kilpatrickstockton.com](mailto:acharnes@kilpatrickstockton.com)  
Alex Seth Fonoroff: [afonoroff@kilpatrickstockton.com](mailto:afonoroff@kilpatrickstockton.com)  
Alexandra A.E. Shapiro: [ashapiro@machtshapiro.com](mailto:ashapiro@machtshapiro.com)  
Andrew C. DeVore: [acd@devoredemarco.com](mailto:acd@devoredemarco.com)  
Bruce P. Keller: [bpkeller@debevoise.com](mailto:bpkeller@debevoise.com)  
Cynthia S. Arato: [carato@machtshapiro.com](mailto:carato@machtshapiro.com)  
Daniel J. Fetterman: [dfetterman@kasowitz.com](mailto:dfetterman@kasowitz.com)  
Daniel Joseph Kornstein: [DKornstein@KVWMail.com](mailto:DKornstein@KVWMail.com)  
Daralyn Jeanine Durie: [ddurie@durietangri.com](mailto:ddurie@durietangri.com)  
David A. Zapolsky: [davidz@amazon.com](mailto:davidz@amazon.com)  
Harold Bloom: [mguzman@khhte.com](mailto:mguzman@khhte.com)  
James Taylor Lewis Grimmelmenn: [james.grimmelmenn@nyls.edu](mailto:james.grimmelmenn@nyls.edu)  
Jeffrey A. Conciatori: [jeffreyconciatori@quinnemanuel.com](mailto:jeffreyconciatori@quinnemanuel.com)  
Joanne E. Zack: [jzack@bonizack.com](mailto:jzack@bonizack.com)  
Joseph C. Gratz: [jgratz@durietangri.com](mailto:jgratz@durietangri.com)  
Joseph M. Beck: [jbeck@kilpatrickstockton.com](mailto:jbeck@kilpatrickstockton.com)  
Joseph Solomon Hall: [jhall@khhte.com](mailto:jhall@khhte.com)  
Laura Helen Gundersheim: [Laura@blbglaw.com](mailto:Laura@blbglaw.com)  
Michael J. boni: [mboni@bonizack.com](mailto:mboni@bonizack.com)  
Mikaela Ann McDermott: [mmcdermott@kvwmail.com](mailto:mmcdermott@kvwmail.com)  
Nathan Z. Dershowitz: [ndershowitz@lawdea.com](mailto:ndershowitz@lawdea.com)  
Peter Jonathan Toren: [ptoren@kasowitz.com](mailto:ptoren@kasowitz.com)  
Ronald Lee Raider: [raider@kilpatrickstockton.com](mailto:raider@kilpatrickstockton.com)  
Sanford P. Dumain: [sdumain@milberg.com](mailto:sdumain@milberg.com)  
Theodore Conrad Max: [tmax@sheppardmullin.com](mailto:tmax@sheppardmullin.com)

And upon the following individuals via United States Postal Service, first class mail:

Cindy A. Cohen  
Legal Director of the Electronic Frontier Foundation  
454 Shotwell Street  
San Francisco, CA 94110

David Nimmer, Irell & Manella LLP  
Attn: David Blasband  
1800 Avenue of the Stars  
Suite 900  
Los Angeles, CA 90067

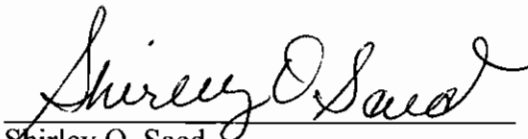


Hadley Perkins Roeltgen  
Kohn, Swift & Graf, PC  
One South Broad Street  
Suite 2100  
Philadelphia, PA 19107

J. Kate Reznick  
Boni & Zack LLC  
15 St. Asaphs Road  
Bala Cynwyd, PA 19004

Matthews Christian Schrurers  
Computer and Communications Industry Association  
900 17th Street  
Suite 1100  
Washington, DC 20006

Dated: September 15, 2009

  
Shirley O. Saed