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Attorneys for Defendant Isiah Thomas

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

Anucha Browne Sanders,

Plaintiff,

v.

Madison Square Garden, L.P., and Isiah Lord

Thomas III
Sanders v. Madison Square Garden, L.P. et al

Defendant.

06 CV 0589 (GEL)(DCF)

**NOTICE OF MOTION FOR PRO
HAC VICE ADMISSION OF
LUCETTA V. FRANCO**

Doc. 32

PLEASE TAKE NOTICE that upon the annexed declaration of Lisa Horwitz and the Certificate of Good Standing annexed thereto, Defendant Isiah Thomas will move the Court before the Honorable Gerard E. Lynch at the United States Courthouse for the Southern District of New York, pursuant to Civil 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 granting *pro hac vice* admission of Lucetta V. Franco, a senior trial counsel of the law firm of Eisenberg & Bogas, P.C., and a member in good standing of the Bar of the State of Michigan.


597407 \$25 11-16-06 MG

FILED
NOV 16 2006
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Dated: New York, New York
November 15, 2006

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

By:  _____

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Attorneys for Defendant Isiah Thomas

Accordingly, it is ORDERED that LUCETTA V. FRANCO is hereby permitted to appear *pro hac vice* as counsel for Defendant Isiah Thomas in this matter.

IT IS SO ORDERED, this ___ day of _____, 2006.

Hon. Gerard E. Lynch
United States District Court
Southern District of New York

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

Anucha Browne Sanders,)	
)	
Plaintiff,)	06 CV 0589 (GEL)(DCF)
)	
v.)	
)	
Madison Square Garden, L.P., Isiah Lord Thomas)	DECLARATION OF LISA
III, and James L. Dolan,)	HORWITZ IN SUPPORT OF
)	MOTION FOR PRO HAC VICE
Defendants.)	ADMISSION OF LUCETTA V.
)	FRANCO

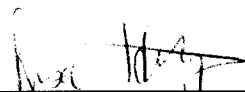
I, LISA HORWITZ, hereby declare under penalty of perjury:

1. I am a member of the bar of the State of New York and of the Southern District of New York and am an attorney at Manatt, Phelps & Phillips, LLP, counsel for Defendant Isiah Thomas in the above-captioned matter. I submit this declaration in support of the application of Lucetta V. Franco for admission to the bar of this Court *pro hac vice*.

2. Ms. Franco is a senior trial counsel at the law firm of Eisenberg & Bogas, P.C., which is based in Bloomfield Hills, Michigan. She has practiced law for more than thirty years and is a highly regarded expert in fair employment practices law. Ms. Franco has served as a mediator, arbitrator and facilitator in employment cases and was a corporation counsel for Wayne County in Michigan. Ms. Franco is a member in good standing of the bar of the State of Michigan and is also admitted in the

United States District Courts for the Eastern and Western Districts of Michigan. Annexed hereto as Exhibit A is a certificate of good standing from the State Bar of Michigan for Ms. Franco. Ms. Franco's expertise in fair employment practices law makes her an invaluable member of the defense team.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on November 15, 2006.



Lisa Horwitz (LH 8168)

State Bar of Michigan

Certificate of Good Standing



This certifies that Lucetta V. Franco, P25476 of Bloomfield Hills, Michigan is an active member of the State Bar of Michigan in good standing. She was admitted to practice in Michigan on October 23, 1975 in Wayne County and became a member of the State Bar of Michigan on October 23, 1975.

A handwritten signature in cursive script, appearing to read "Janet K. Welch".

Janet K. Welch
Interim Executive Director
November 07, 2006



