

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

MADISON SQUARE GARDEN, L.P., ISIAH LORD THOMAS III AND JAMES L. DOLAN,

Defendants.

Civil Case No. 06 Civ. 0589 (GEL) (DCF)

ECF CASE

MOTION TO ADMIT COUNSEL PRO HAC VICE



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, Laurie Berke-Weiss a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice

of:



Eisenberg & Bogas, P.C.
33 Bloomfield Hills Parkwa
Bloomfield Hills, MI 48304 33 Bloomfield Hills Parkway, Suite 145 Bloomfield Hills, MI 48304 248-258-6080 (Phone) 248-258-9212 (Fax)

> KATHLEEN L. BOGAS is a member in good standing of the Bar of the State of Michigan.

There are no pending disciplinary proceedings against KATHLEEN L. BOGAS in any State or Federal Court.

Doc. 53

Respectfully submitted,

Laurie Berke-Weiss (LB-3445) Berke-Weiss & Pechman LLP 488 Madison Avenue, 11th Floor

New York, NY 10022 (212) 583-9500 (Phone) (212) 308-8582 (Fax)

TO: Anne C. Vladeck (AV-4857)
Kevin T. Mintzer (KM-4741)
Karen Cacace (KC-3184)
Vladeck, Waldman,
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1501 Broadway, Suite 800
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Ronald M. Green (RG-7766)
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Brian G. Cesaratto (BC- 5464)
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DECLARATION OF LAURIE BERKE-WEISS IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

LAURIE BERKE-WEISS, hereby declares under penalty of perjury:

- 1. I am a Partner at Berke-Weiss & Pechman LLP, counsel for Defendant Isiah Lord Thomas III ("Defendant Thomas") 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 Defendant Thomas' motion to admit Kathleen L. Bogas as counsel pro hac vice to represent Defendant Thomas 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 in 1984. I also was admitted to the bar of the United States District Court for the Southern District of New York in 1984, and am in good standing with this Court.
- 3. I have known Kathleen L. Bogas since 2007.
- 4. Ms. Bogas is a Partner at Eisenberg & Bogas, P.C., in Bloomfield Hills, Michigan. She is a member in good standing of the State Bar of Michigan and a certificate to that effect dated May 29, 2007, is annexed hereto as Exhibit A.
- 5. Ms. Bogas has practiced as a trial attorney since 1975 and is a highly regarded employment practices lawyer. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. As such she is an invaluable member of the defense team on this matter.
- 6. Accordingly, I am pleased to move the admission of Kathleen L. Bogas, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Kathleen L. Bogas, pro hac vice, which is attached hereto as Exhibit B.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York. New York on June 20, 2007.



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ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Laurie Berke-Weiss, attorney for Defendant Isiah Lord Thomas III and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that

Kathleen L. Bogas Eisenberg & Bogas, P.C. 33 Bloomfield Hills Parkway, Suite 145 Bloomfield Hills, MI 48304 248-258-6080 (Phone) 248-258-9212 (Fax) klb@ebpclaw.com (Email)

is admitted to practice *pro hac vice* as counsel for Defendant Isiah Lord Thomas III 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 Rule 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. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York June , 2007

United States District/Magistrate Judge

Sue Ellen Eisenberg (SE-4713) – admitted pro hac vice Lucetta Franco (LF-7638) - admitted pro hac vice Eisenberg & Bogas, P.C. 33 Bloomfield Hills Parkway, Suite 145 Bloomfield Hills, Michigan 48304-2945 (248) 258-6080

- and -

Laurie Berke-Weiss (LB-3445) Louis Pechman (LP-6395) Berke-Weiss & Pechman, LLP 488 Madison Avenue New York, New York 10022 (212) 583-9500

Attorneys for Defendant Isiah Lord Thomas III

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AFFIDAVIT OF SERVICE

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

Samantha Hermann, being duly sworn, deposes and says:

I am over 18 years of age, reside in Westfield, New Jersey, and am not a party to this action.

On JUNE 20, 2007 I served the MOTION TO ADMIT COUNSEL PRO HAC VICE, DECLARATION OF LAURIE BERKE-WEISS IN SUPPORT OF MOTION TO ADMIT

COUNSEL PRO HAC VICE AND EXHIBITS in the above-captioned matter by depositing a true copy of the papers, enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service to the addresses set forth below:

Anne C. Vladeck (AV-4857) Kevin T. Mintzer (KM-4741) Karen Cacace (KC-3184) Vladeck, Waldman, Elias & Engelhard, P.C. Attorneys for Plaintiff 1501 Broadway, Suite 800 New York, NY 10036 (212) 403-7300

Ronald M. Green (RG-7766) Theresa M. Holland (TH- 6973) Brian G. Cesaratto (BC- 5464) Epstein Becker & Green, P.C. Attorneys for Defendants Madison Square Garden, L.P. and James L. Dolan 250 Park Avenue New York, NY 10177 (212) 351-4500

Amber L. Kagan (AK-7973) Morgan, Lewis & Bockius LLP Attorneys for Defendants Madison Square Garden, L.P. and James L. Dolan 101 Park Avenue New York, NY 10178 (212) 309-6000

Sworn to before me this **2**0th day of June 2007

LAURIE BERKE-WEISS Notary Public, State of New York No. 4868442 Qualified in New York County Commission Expires July 28, 20