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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL INC.,  
COMEDY PARTNERS,  
COUNTRY MUSIC TELEVISION, INC.,  
PARAMOUNT PICTURES  
CORPORATION,  
and BLACK ENTERTAINMENT  
TELEVISION LLC,

Plaintiffs,

v.

YOUTUBE, INC., YOUTUBE, LLC, and  
GOOGLE INC.

Defendants.

ECF Case

No. 1:07-cv-02103 (LLS) (FM)

**MOTION FOR PRO HAC VICE  
ADMISSION OF BART E. VOLKMER**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Tonia Ouellette Klausner, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Handwritten mark resembling a stylized 'S' or '5'.

Handwritten mark resembling a stylized 'MOTION'.

[Viacom International, Inc. et al](#) [y. Youtube, Inc. et al](#)

|                   |  |
|-------------------|--|
| Applicant's Name: | Bart E. Volkmer                        |
| Firm Name:        | Wilson Sonsini Goodrich & Rosati, P.C. |
| Address:          | 650 Page Mill Road                     |
| City/State/Zip:   | Palo Alto, CA 94304                    |
| Phone Number:     | (650) 493-9300                         |
| Fax Number:       | (650) 493-6811                         |

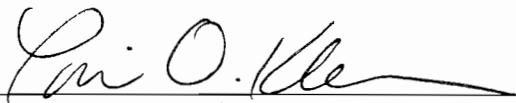
Doc. 35

Mr. Volkmer is a member in good standing of the Bar of the State of California. There

are no pending disciplinary proceedings against Mr. Volkmer in any State or Federal court.

Date: May 8, 2007

Respectfully submitted,



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Tonia Ouellette Klausner (TOK-8279)  
WILSON SONSINI GOODRICH & ROSATI  
PROFESSIONAL CORPORATION  
1301 Avenue of the Americas, 40th Floor  
New York, New York 10019  
(212) 999-5800  
Fax (212) 999-5899

*Attorneys for Defendants YouTube, Inc.,  
YouTube, LLC and Google Inc.*

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No. 1:07-cv-02103 (LLS) (FM)

**AFFIDAVIT OF TONIA OUELLETTE  
KLAUSNER IN SUPPORT OF  
MOTION FOR PRO HAC VICE  
ADMISSION OF BART E. VOLKMER**

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

Tonia Ouellette Klausner, being duly sworn, hereby deposes and says as follows:

1. I am associated with the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel for defendants YouTube, Inc., YouTube LLC, and Google Inc. (collectively, "Defendants") 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 Defendants' motion to admit Bart E. Volkmer as counsel *pro hac vice* to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, where I was admitted to practice law in 1994. 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. Mr. Volkmer is an associate of the law firm of Wilson Sonsini Goodrich & Rosati, P.C., in Palo Alto, California. A true and correct copy of Mr. Volkmer's Certificate of Good Standing is attached hereto as Exhibit "A".


4. I have found Mr. Volkmer to be a skilled attorney and of high moral character.

5. Accordingly, I am pleased to move the admission of Bart E. Volkmer, *pro hac vice*.

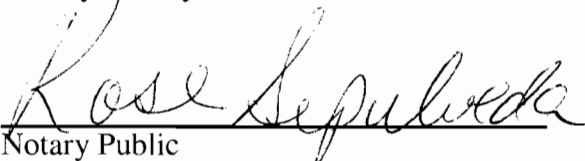
6. I respectfully submit a proposed order granting the admission *pro hac vice* of Bart E. Volkmer, which is attached hereto as Exhibit "B".

WHEREFORE it is respectfully requested that the motion to admit Bart E. Volkmer, *pro hac vice*, to represent Defendants in the above-captioned matter, be granted.

Date: May 8, 2007  
New York, New York

  
\_\_\_\_\_  
Tonia Ouellette Klausner

Sworn to before me this  
8th day of May, 2007

  
\_\_\_\_\_  
Notary Public

ROSE M. SEPULVEDA  
Notary Public, State of New York  
No. 01SE6031652  
Qualified in Kings County  
Commission Expires Oct. 4, 2009



THE  
STATE BAR  
OF CALIFORNIA

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180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

May 2, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, BART EDWARD VOLKMER, #223732 was admitted to the practice of law in this state by the Supreme Court of California on December 11, 2002; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

  
Kath Lambert  
Custodian of Membership Records

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No. 1:07-cv-02103 (LLS) (FM)

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

Upon the motion of Tonia Ouellette Klausner, attorney for defendants YouTube, Inc., YouTube, LLC, and Google Inc. (collectively, "Defendants"), and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED THAT**

Applicant's Name: Bart E. Volkmer  
Firm Name: Wilson Sonsini Goodrich & Rosati, P.C.  
Address: 650 Page Mill Road  
City/State/Zip: Palo Alto, CA 94304  
Phone Number: (650) 493-9300  
Fax Number: (650) 493-6811

is admitted to practice *pro hac vice* as counsel for Defendant 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. This action has been assigned to the Electronic Case Filing (ECF) system and as such, counsel shall immediately register for an ECF password.

Dated: May \_\_\_\_, 2007  
New York, New York

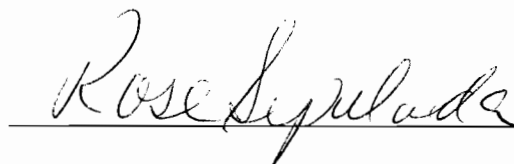
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United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2007, I caused a true and correct copy of the Motion for Pro Hac Vice Admission of Bart E. Volkmer to be served by overnight delivery on:

Donald B. Verrilli, Jr., Esq.  
William M. Hohengarten, Esq.  
Amy L. Tenney, Esq.  
Scott B. Wilkens, Esq.  
Luke C. Platzer, Esq.  
Sharmilia Sohoni, Esq.  
Jenner & Block, LLP  
601 Thirteenth Street, N.W.  
Suite 1200 South  
Washington, D.C. 20005-3823

  
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