# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK



THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED and BOURNE CO., on behalf of themselves and all others similarly situated,	) Civil Action No. 07 Civ. 3582 (LLS) )	
Plaintiffs,	)	
	)	
V.	)	
YOUTUBE, INC., YOUTUBE, LLC and	, )	
GOOGLE, INC.,	)	
Defendants	)	٠
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### NOTICE OF MOTION AND MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTINA H. CONNOLLY

GIRARD GIBBS LLP
Daniel C. Girard
Aaron M. Sheanin
Christina H. Connolly
Jonathan K. Levine (JL-8390)
601 California Street, 14<sup>th</sup> Floor
San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

PLEASE TAKE NOTICE that, upon the accompanying Declarations of Jonathan K. Levine and Christina H. Connolly, dated November 7, 2007 and the exhibits annexed thereto, and upon all prior papers and proceedings, Plaintiffs will move this Court on a date to be determined, upon submission, unless otherwise ordered by the Court, for an order permitting Christina H. Connolly of Girard Gibbs LLP, counsel for plaintiffs, to practice before this Court in connection with all proceedings in these matters.

Respectfully submitted,

GIRARD GIBBS/LLP

Dated: November 7, 2007

Jonathan K. Levine (JK-8390)

Daniel C. Girard Aaron M. Sheanin Christina H. Connolly

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Telephone: (415) 981-4800 Facsimile: (415) 981-4846

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED and BOURNE CO., on behalf of themselves and all others similarly situated,	) Civil Action No. 07 Civ. 3582 (LLS)
Plaintiffs,	)
v.	)
YOUTUBE, INC., YOUTUBE, LLC and GOOGLE, INC.,	) ) )
Defendants	) )

DECLARATION OF JONATHAN K. LEVINE IN SUPPORT OF PLAINTIFFS' MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTINA H. CONNOLLY

GIRARD GIBBS LLP
Daniel C. Girard
Aaron M. Sheanin
Christina H. Connolly
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San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

I, Jonathan K. Levine, hereby declare as follows:

- I am an attorney duly admitted to practice before this Court. My admission to this Court was on March 14, 1989.
- 2. I am not under suspension or disbarment by any court.
- 3. I am a partner of the firm of Girard Gibbs LLP, and my office is located at 601 California Street, 14<sup>th</sup> Floor, San Francisco, California 94108. My telephone number is (415) 981-4800.
- 4. I make this affidavit in support of Plaintiffs' motion for the admission of Christina H. Connolly *pro hac vice*.
- 5. I have known Christina H. Connolly for 1 year and believe she will uphold the integrity of this Court and will comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct. Executed this 7<sup>th</sup> day of November, 2007 at San Francisco,

Jonathan K. Levine

State of California ) County of San Francisco )

California.

On November <u>1</u>, 2007, before me, Sue Querubin, Notary Public, personally appeared Jonathan K. Levine, personally known to be to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity on behalf of which the person acted, executed the instrument.



WITNESS my hand and official seal.

#### UNITED STATES DISTRICT COURT

#### SOUTHERN DISTRICT OF NEW YORK

THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED and BOURNE CO., on behalf of themselves and all others similarly situated,	)     Civil Action No. 07 Civ. 3582 (LLS) ) )
Plaintiffs,	) ) )
v.	)
YOUTUBE, INC., YOUTUBE, LLC and GOOGLE, INC.,	) )
Defendants	) )

## DECLARATION OF CHRISTINA H. CONNOLLY IN SUPPORT OF PLAINTIFFS' MOTION FOR *PRO HAC VICE* ADMISSION

GIRARD GIBBS LLP
Daniel C. Girard
Aaron M. Sheanin
Christina H. Connolly
Jonathan K. Levine (JL-8390)
601 California Street, 14<sup>th</sup> Floor
San Francisco, California 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846

- I, Christina H. Connolly, hereby declare as follows:
- I am an attorney duly admitted to practice to law in the State of California since
   December 5, 2006. Attached hereto as "Exhibit A" is an original Certificate of Good
   Standing from the State Bar of California dated November 6, 2007.
- 2. I am not under suspension or disbarment by any court.
- 3. I am an associate of the firm of Girard Gibbs LLP, and my office is located at 601 California Street, 14<sup>th</sup> Floor, San Francisco, California 94108. My telephone number is (415) 981-4800.
- 4. I make this affidavit in support of Plaintiffs' motion for my admission pro hac vice.
- 5. I recognize that if I am admitted *pro hac vice*, I am within the disciplinary jurisdiction of the United States District Court for the Southern District of New York. Upon my admission *pro hac vice*, I agree to comply with all applicable New York Local Rules of Civil Procedure.

I declare under penalty of perjury and the laws of the United States of America that the foregoing is true and correct. Executed this 7<sup>th</sup> day of November, 2007 at San Francisco, California.

Christina H. Connolly

State of California ) County of San Francisco )

On November 7, 2007, before me, Sue Querubin, Notary Public, personally appeared Christina H. Connolly, personally known to me (or proved by satisfactory evidence) to be the person whose name is subscribed to the within instrument and acknowledged to me that she executed the same in her authorized capacity, and that by her signature on the instrument the person, or the entity on behalf of which the person acted, executed the instrument.



WITNESS my hand and official seal.

## EXHIBIT A



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

November 6, 2007

#### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, CHRISTINA HILDEGARD CONNOLLY, #245869 was admitted to the practice of law in this state by the Supreme Court of California on December 5, 2006; 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

#### UNITED STATES DISTRICT COURT

#### SOUTHERN DISTRICT OF NEW YORK

THE FOOTBALL ASSOCIATION PREMIER	)
LEAGUE LIMITED and BOURNE CO., on	) Civil Action No. 07 Civ. 3582 (LLS)
behalf of themselves and all others similarly	)
situated,	)
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Plaintiffs,	)
,	)
V.	)
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YOUTUBE, INC., YOUTUBE, LLC and	)
GOOGLE, INC.,	)
doodle, inc.,	)
Defendants	)
Defendants	)
	<u>_</u> )

#### [PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR PRO HAC VICE ADMISSION OF CHRISTINA H. CONNOLLY

GIRARD GIBBS LLP
Daniel C. Girard
Aaron M. Sheanin
Christina H. Connolly
Jonathan K. Levine (JL-8390)
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San Francisco, California 94108
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Facsimile: (415) 981-4846

GOOD CAUSE SHOWING, and by and through the moving papers of counsel, the declarations filed in support thereof, and no opposition filed by any party;

IT IS HEREBY ORDERED that Christina H. Connolly be admitted before this Court *pro hac vice*, as an attorney for Plaintiffs in this action.

IT	TC	SO	<b>OD</b>	DE	DE	D
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Dated:	
	Honorable Louis L. Stanton,
	United States District Judge

#### UNITED STATES DISTRICT COURT

#### SOUTHERN DISTRICT OF NEW YORK

THE FOOTBALL ASSOCIATION PREMIER LEAGUE LIMITED and BOURNE CO., on behalf of themselves and all others similarly	) Civil Action No. 07 Civ. 3582 (LLS)
situated,	)
Plaintiffs,	) ) )
v.	)
YOUTUBE, INC., YOUTUBE, LLC and GOOGLE, INC.,	) )
Defendants	) ) _)

#### PROOF OF SERVICE

GIRARD GIBBS LLP
Daniel C. Girard
Aaron M. Sheanin
Christina H. Connolly
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601 California Street, 14<sup>th</sup> Floor
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Facsimile: (415) 981-4846

I, Cristina M. Altamirano, hereby declare as follows:

I am employed by Girard Gibbs, A Limited Liability Partnership, located at 601 California Street, Suite 1400, San Francisco, California 94108. I am over the age of eighteen years and am not a party to this action. On November 7, 2007, I served the attached document:

- 1. NOTICE OF MOTION AND MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTINA H. CONNOLLY;
- 2. DECLARATION OF JONATHAN K. LEVINE IN SUPPORT OF PLAINTIFFS' MOTION FOR *PRO HAC VICE* ADMISSION OF CHRISTINA H. CONNOLLY;
- 3. DECLARATION OF CHRISTINA H. CONNOLLY IN SUPPORT OF PLAINTIFFS' MOTION FOR *PRO HAC VICE* ADMISSION;
- 4. [PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR PRO HAC VICE ADMISSION OF CHRISTINA H. CONNOLLY; and
- 5. PROOF OF SERVICE.

on:

#### SEE ATTACHED SERVICE LIST

<u> </u>	by placing the document(s) listed above for collection and mailing following the firm's ordinary business practice in a sealed envelope with postage thereon fully prepaid for deposit in the United States mail at San Francisco, California addressed as set forth below.
	by causing personal delivery by Spincycle of the document(s) listed above to the person(s) at the address(es) set forth below.
	by depositing the document(s) listed above in a sealed envelope with delivery fees provided for a FedEx pick up box or office designated for overnight delivery, and addressed as set forth below.
	by transmitting via facsimile the above listed document(s) to the fax number(s) set forth below on this date.
	I declare under penalty of perjury under the laws of the State of California that the above is

true and correct, executed November 7, 2007, at San Francisco, California.

Chistina M. Olfamisa Cristina M. Altamirano

#### **SERVICE LIST**

### The Football Association Premier League Limited, et al. v. YouTube, Inc. et al. Case No. 1:07-CV-3582

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