

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

THE FOOTBALL ASSOCIATION PREMIER  
LEAGUE LIMITED, et al.,

Plaintiffs,

v.

YOUTUBE, INC., et al.,

Defendants.

ECF Case

Case No. 1:07-cv-3582 (LLS) (FM)

**MOTION TO ADMIT GERALD  
MARTIN *PRO HAC VICE***

AUG 29 2008

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

Applicant's Name: Gerald E. Martin  
Firm Name: Barrett Johnston & Parsley  
Address: 217 Second Avenue North  
City/State/Zip: Nashville, Tennessee 37201  
Telephone/Fax: (615) 244-2202/(615) 251-3798  
Email Address: [jmartin@barrettjohnston.com](mailto:jmartin@barrettjohnston.com)

Gerald Martin is a member in good standing of the Bar of the State of Tennessee. There are no pending disciplinary proceedings against Mr. Martin in any State of Federal court.

Dated: August 28, 2008  
New York, New York

Respectfully Submitted,



Louis M. Solomon  
PROSKAUER ROSE LLP  
1585 Broadway  
New York, NY 10036-8299  
Phone: (212) 969-3000  
Fax: (212) 969-2900  
[lsolomon@proskauer.com](mailto:lsolomon@proskauer.com)

*Attorneys for Lead Plaintiffs, Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, and The Scottish Premier League Limited, and for the Prospective Class*

921925-6001795

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ECF Case

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Defendants.

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on August 29, 2008, the following documents were served upon all counsel in this action and in the action, *Viacom Int'l Inc., et al., v. YouTube, Inc., et al.*, 07 Civ. 2103 (LLS), via electronic mail:

1. Motion to Admit Gerald Martin *Pro Hac Vice*;
2. Affidavit in Support of Motion to Admit Gerald Martin *Pro Hac Vice* with supporting exhibit and Proposed Order for Admission of Gerald Martin *Pro Hac Vice* on Written Motion.

  
\_\_\_\_\_  
Dolores F. DiBella

PROSKAUER ROSE LLP  
1585 Broadway  
New York, New York 10036-8299  
Telephone: (212) 969-3000  
Facsimile: (212) 969-2900

*Attorneys for Lead Plaintiffs, Named Plaintiffs  
Murbo Music Publishing, Inc., Cherry Lane Music  
Publishing Company, Inc., Robert Tur d/b/a Los  
Angeles News Service, X-Ray Dog Music, Inc.,  
Fédération Française de Tennis, and The Scottish  
Premier League Limited, and for the Prospective  
Class*

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SOUTHERN DISTRICT OF NEW YORK

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ECF Case

Case No. 1:07-cv-03582 (LLS) (FM)

**AFFIDAVIT OF LOUIS M.  
SOLOMON IN SUPPORT OF  
MOTION TO ADMIT  
GERALD MARTIN  
PRO HAC VICE**

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

Louis M. Solomon, being duly sworn, hereby deposes and says as follows:

1. I am a member of the law firm of Proskauer Rose LLP, counsel for Lead Plaintiffs The Football Association Premier League Limited and Bourne Co., Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, and The Scottish Premier League Limited, and for the Prospective Class (collectively, "Plaintiffs") 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 Plaintiffs' Motion to Admit Gerald Martin as counsel *pro hac vice* to represent Plaintiff Cal IV Entertainment, LLC 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 1980. 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. Martin is a partner of the law firm of Barrett Johnston & Parsley in Nashville, Tennessee. A true and correct copy of Mr. Martin's Certificate of Good Standing is attached hereto as Exhibit A.

4. I have found Mr. Martin to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Procedure.

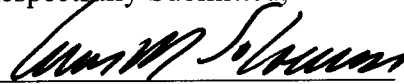
5. Accordingly, I am pleased to move the admission of Gerald Martin, *pro hac vice*.

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

WHEREFORE it is respectfully requested that the motion to admit Gerald Martin, *pro hac vice*, to represent Plaintiff Cal IV Entertainment LLC in the above-captioned matter, be granted.

Dated: August 28, 2008  
New York, New York

Respectfully Submitted,



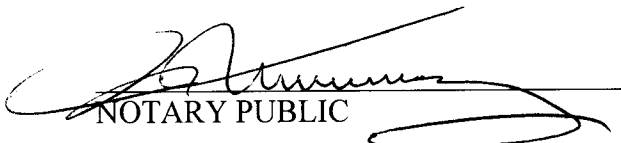
Louis M. Solomon  
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*Attorneys for Lead Plaintiffs, Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, and The Scottish Premier League Limited, and for the Prospective Class*

STATE OF NEW YORK )

COUNTY OF NEW YORK )

Sworn to and subscribed before me  
This 28<sup>th</sup> day of August, 2008



NOTARY PUBLIC

**JESUS HERNANDEZ**  
Notary Public, State of New York  
No. 01NE4814408  
Qualified in Kings County  
Commission Expires Feb. 28, 2011

***CLERK OF THE SUPREME COURT  
STATE OF TENNESSEE***

*I, Michael W. Catalano, Clerk of the Supreme Court, do hereby certify that **GERALD MARTIN** is a licensed and practicing attorney of the Courts of this State, having taken the oath as prescribed by law, is enrolled as an attorney of this Court, and is in good standing. The Supreme Court is the Court of last resort in Tennessee.*

*Date of Enrollment: November 2, 1999.*

*In testimony whereof, I have set my hand and affixed the seal of the Court on this the 15th day of August 2008.*

*Michael W. Catalano, Clerk*

By *Chris Vickers* D.C.

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ECF Case

Case No. 1:07-cv-3582 (LLS) (FM)

**ORDER FOR ADMISSION OF  
GERALD E. MARTIN  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Louis M. Solomon, attorney for Lead Plaintiffs The Football Association Premier League Limited and Bourne Co., Named Plaintiffs Murbo Music Publishing, Inc., Cherry Lane Music Publishing Company, Inc., Robert Tur d/b/a Los Angeles News Service, X-Ray Dog Music, Inc., Fédération Française de Tennis, and The Scottish Premier League Limited, and for the Prospective Class (collectively, "Plaintiffs") and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Gerald E. Martin  
Firm Name: Barrett Johnston & Parsley  
Address: 217 Second Avenue North  
City/State/Zip: Nashville, Tennessee 37201  
Telephone/Fax: (615) 244-2202/(615) 251-3798  
Email Address: [jmartin@barrettjohnston.com](mailto:jmartin@barrettjohnston.com)

is admitted to practice *pro hac vice* as counsel for Cal IV Entertainment LLC 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: August \_\_, 2008  
New York, New York

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United States District Judge