

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WARNER BROS. ENTERTAINMENT, INC.	:	
J.K. ROWLING,	:	07 Civ 9667 (RPP)
	:	
- against -	:	MOTION TO ADMIT
	:	<i>COUNSEL PRO HAC VICE</i>
RDR BOOKS, AND DOES 1-10	:	
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APR 03 2008

Pursuant to Rule 1.3 (c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, David S. Hammer, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Lizbeth Hasse
Creative Industry Law Group
526 Columbus Ave. 2nd Floor
San Francisco, CA 94133
Telephone: (415) 433-4390
Fax (415) 433-6580

Lizbeth Hasse is a member in good standing of the Bar of the State of California, and there are not pending disciplinary proceedings against her in any State or Federal court.

Dated: New York, New York
April 2, 2008

Respectfully submitted,



David S. Hammer (DH 9957)
99 Park Avenue
Suite 1600
New York, New York 10016
(212) 941-8118

Counsel of Record for Defendant
RDR Books

FILED
U.S. DISTRICT COURT
2008 APR - 2 AM 10:57
S.D. N.Y.

Handwritten notes: 4350737 - 526 DL

To:
Dale Margaret Cendali
O'Melveny & Myers LLP
7 Times Square
New York, NY 10036

Counsel for Plaintiffs
Warner Bros. Entertainment, Inc.
and J.K. Rowling

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
WARNER BROS. ENTERTAINMENT, INC.	:	07 Civ 9667 (RPP)
J.K. ROWLING,	:	
	:	
- against -	:	AFFIDAVIT OF DAVID S.
	:	HAMMER IN SUPPORT OF
RDR BOOKS, AND DOES 1-10	:	DEFENDANT'S MOTION TO
	:	<u>ADMIT COUNSEL PRO HAC VICE</u>
-----	X	

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

DAVID S. HAMMER, being duly sworn, deposes and says:

1. I am an attorney in good standing with the bar of this Court, as well as the bar of the State of New York, having been admitted to practice in this Court and the State of New York in February 1976. I am also counsel of record for the defendant RDR Books in this action. I make this affidavit based on my personal dealings with the attorneys whose admission I seek in this motion, and on the evidence they have presented me of their good standing with the bars of their respective states of practice.

2. I am familiar with the background and reputation of Lizbeth Hasse, Esq. I have also discussed the present case at length with her over the last four months. Ms. Hasse is a highly skilled and experienced practitioner, with a national reputation in copyright law, as well as a person of high moral character and integrity. She has participated in a number of actions and is familiar with the Federal Rules of Civil Procedure.

3. Ms. Hasse has represented defendant RDR Books in a number of matters over a number of years. Her experience with the client, with copyright law in general, and with this

particular case, are all very deep. For these reasons, I am pleased and honored to move her admission in this action, *pro hac vice*.

4. Annexed hereto as Exhibit 1 is the Affidavit of Lizbeth Hasse, setting forth her bar admission and experience, as well as attaching a Certificate of Good Standing issued by the State of California.

5. Annexed hereto as Exhibit 2 is a proposed order granting the admission of Ms. Hasse to participate with me in the representation of RDR Books.

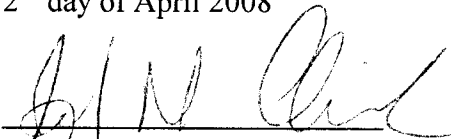
6. Finally, I note that, while this Court has granted my application to admit two other attorneys Pro Hac Vice on this case, only one of those attorneys – Anthony Falzone, Esq. – will be participating in the hearing and trial; the other attorney, Robert Handelsman will not. Ms. Hasse’s admission therefore will mean that three attorneys sit at counsel table for RDR Books – myself, Mr. Falzone, and Ms. Hasse.

WHEREFORE, I respectfully request that my application to admit Lizbeth Hasse, *pro hac vice*, in the above captioned matter be granted.



DAVID S. HAMMER (DH 9957)

Sworn to before me this
2nd day of April 2008



NOTARY PUBLIC

AOIFE NICHOLEAN
Notary Public, State of New York
No. 02N16095116
Qualified in New York County
Commission Expires July 7, 2011

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WARNER BROS. ENTERTAINMENT INC.
and J.K. ROWLING,

Plaintiffs,

- against -

RDR BOOKS AND DOES 1-10,

Defendants.

Case No.: 07 CV 9667 (RPP)

ECF Case

**AFFIDAVIT OF LIZBETH HASSE IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

I, Lizbeth Hasse, file this affidavit in support of RDR Books' Motion for Admission Pro Hac Vice, and hereby state as follows:

1. I am a resident of the State of California. I am an attorney-at-law at Creative Industry Law Group in San Francisco, California and have represented Roger Rapoport and RDR books, the defendant in this case, for approximately 15 years on various legal matters.

2. I have been asked by RDR Books LCC to act as co-counsel in this matter with David Hammer. I have read the pleadings and discussed and analyzed this matter with Mr. Rapoport (Publisher of RDR Books) and Mr. Hammer. Accordingly, I am fully informed of the issues involved in this matter.

3. I have been admitted to practice law in California since 1982, and I am a member in good standing of the Bar of the State of California. I am also admitted to practice in the federal court of the Northern District of California. A certificate of good

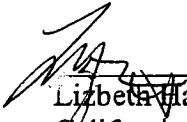
standing certifying my status as a member of the California State Bar is attached to this affidavit as Exhibit A.

4. I have never been the subject of disciplinary action by the bars or courts of any jurisdiction.

5. I have never been denied admission to any court to which I have applied.

6. My office address, telephone number and facsimile number are included below my signature.

Dated: March 31, 2008



Lizbeth Hasse
California State Bar No. 104517
Creative Industry Law Group
526 Columbus Ave., 2nd Floor
San Francisco, CA 94133
Telephone: (415) 433-4380
Facsimile: (415) 433-6580
Email: lhasse@creativelawgroup.com

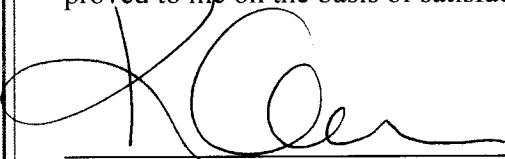
Jurat

State of California

County of SAN FRANCISCO

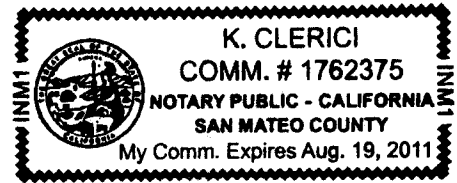
Subscribed and sworn to (or affirmed) before me on this 31 day of MARCH,
2008 by LIZBETH HASSE

proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Signature

(Notary seal)



OPTIONAL INFORMATION

DESCRIPTION OF THE ATTACHED DOCUMENT

AFFIDAVIT OF LIZBETH HASSE IN

(Title or description of attached document)

SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

(Title or description of attached document continued)

Number of Pages 2 Document Date 3/31/08

(Additional information)

INSTRUCTIONS FOR COMPLETING THIS FORM

The wording of all Jurats completed in California after January 1, 2008 must be in the form as set forth within this Jurat. There are no exceptions. If a Jurat to be completed does not follow this form, the notary must correct the verbiage by using a jurat stamp containing the correct wording or attaching a separate jurat form such as this one which does contain proper wording. In addition, the notary must require an oath or affirmation from the document signer regarding the truthfulness of the contents of the document. The document must be signed AFTER the oath or affirmation. If the document was previously signed, it must be re-signed in front of the notary public during the jurat process.

- State and County information must be the State and County where the document signer(s) personally appeared before the notary public.
- Date of notarization must be the date that the signer(s) personally appeared which must also be the same date the jurat process is completed.
- Print the name(s) of document signer(s) who personally appear at the time of notarization.
- Signature of the notary public must match the signature on file with the office of the county clerk.
- The notary seal impression must be clear and photographically reproducible. Impression must not cover text or lines. If seal impression smudges, re-seal if a sufficient area permits, otherwise complete a different jurat form.
 - ❖ Additional information is not required but could help to ensure this jurat is not misused or attached to a different document.
 - ❖ Indicate title or type of attached document, number of pages and date.
- Securely attach this document to the signed document

EXHIBIT A



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

March 28, 2008

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar LIZBETH L. HASSE, #104517 was admitted to the practice of law in this state by the Supreme Court of California on December 3, 1982; 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

A handwritten signature in cursive script, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
WARNER BROS. ENTERTAINMENT, INC.	:	07 Civ 9667 (RPP)
J.K. ROWLING,	:	
	:	
- against -	:	ORDER ADMITTING
	:	<i>COUNSEL PRO HAC VICE</i>
RDR BOOKS, AND DOES 1-10	:	
	:	
-----	X	

Upon the motion and affidavit of David S. Hammer, counsel for Defendant RDR Books,

IT IS HEREBY ORDERED, that

Lizbeth Hasse
Creative Industry Law Group
526 Columbus Ave. 2nd Floor
San Francisco, CA 94133
Telephone: (415) 433-4390
Fax (415) 433-6580

is admitted to practice *pro hac vice* as counsel for Defendants 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.

SO ORDERED

Dated: New York, New York
April , 2007

HON. ROBERT P. PATTERSON
United States District Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
WARNER BROS. ENTERTAINMENT, INC.	:	07 Civ 9667 (RPP)
J.K. ROWLING,	:	
	:	
- against -	:	AFFIRMATION OF SERVICE
	:	
RDR BOOKS, AND DOES 1-10	:	
	:	
-----	X	

STATE OF NEW YORK)
) ss:
COUNTY OF NEW YORK)

I, DAVID S. HAMMER, hereby certify, under penalty of perjury, that on April 2, 2008, I served by United States mail, a copy of (1) defendant's Motion to Admit Counsel Pro Hac Vice, (2) Affidavit of David S. Hammer in Support of Motion to Admit Counsel Pro Hac Vice, and (3) Proposed Order, by causing a copy of the same to be mailed in a sealed envelope, with postage prepaid thereon, in a post-office of official depository of the United States Postal Service within the State of New York, to Dale Cendali, Esq., O'Melveny & Myers, LLP, 7 Times Square, New York, New York 10035.

Dated New York, New York
April 2, 2008



David S. Hammer (DH 9957)