

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CALVIN GIBSON,

Plaintiff,

-against-

CRAIGSLIST, INC.,

Defendant.

08 Cv. 7735 (RMB)

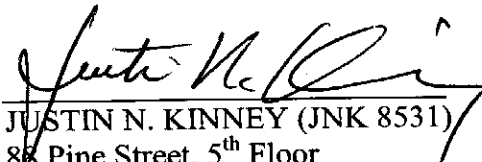
**NOTICE OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

PLEASE TAKE NOTICE that upon the attached Declaration of Justin N. Kinney, Esq. in Support Of Motion For *Pro Hac Vice* Admission, dated November 5, 2008, and the Affidavit and Certificate of Good Standing of Elizabeth L. McDougall, Esq. submitted herewith, Defendant, Craigslist, Inc., moves before the Court for an Order pursuant to Local Rule 1.3(c) of the Southern District Court of New York allowing the admission *pro hac vice* solely for purposes of this litigation of Elizabeth L. McDougall, Esq., Perkins Coie LLP, 1201 Third Avenue, Suite 4800, Seattle, WA 98101, Telephone: (206) 359-6365, Fax: (206) 359-7365.

Dated: November 5, 2008
New York, NY

Respectfully submitted,

COUGHLIN DUFFY LLP

By: 
JUSTIN N. KINNEY (JNK 8531)
88 Pine Street, 5th Floor
New York, New York 10005
(212) 483-0105
Fax: (212) 480-3899
Attorneys for Defendant Craigslist, Inc.

FILED
NOV 5 2008
S.D. OF N.Y.

NOV 06 2008

To: Paul B. Dalnoky, Esq.
45 East 7 Street, #103
New York, NY 10003
(212) 260-4386
Attorney for Plaintiff Gibson

AFFIDAVIT OF SERVICE BY REGULAR MAIL

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

DONNA H. MAZLISH, being duly sworn, deposes and says:

That I am not a party to this action, I am over 18 years of age and maintain my place of business in New York, New York. That on the 5th day of November 2008, I served the attached **NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE, MOTION, DECLARATION OF JUSTIN N. KINNEY, ESQ., IN SUPPORT OF MOTION AND AFFIDAVIT OF ELIZABETH L. McDOUGALL, ESQ.,** via regular mail on the listed party below at the addresses designated by them for that purpose, by depositing a true copy of same enclosed in a postage paid envelope under the exclusive care and custody of the United Parcel Service.

TO:

Paul B. Dalnoky, Esq.
45 East 7 Street, #103
New York, NY 10003
Attorney for Plaintiff


DONNA H. MAZLISH

Sworn to before me this
5 day of November, 2008.


Notary Public

LEOR J. KAPLAN
Notary Public, State of New York
No. 02-KA6168409
Qualified in New York County
Commission Expires June 11, 2011

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CALVIN GIBSON,

Plaintiff,

-against-

CRAIGSLIST, INC.,

Defendant.

08 Cv. 7735 (RMB)

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

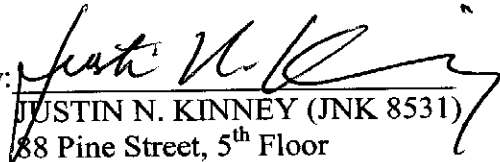
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Justin N. Kinney, Esq., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Elizabeth L. McDougall, Esq., of Perkins Coie LLP, 1201 Third Avenue, Suite 4800, Seattle, WA 98101, Telephone: (206) 359-6365, Fax: (206) 359-7365. Elizabeth L. McDougall, Esq. is a member in good standing of the bar of the State of New York and the bar of the State of Washington and there are no pending disciplinary proceedings against him in any State or Federal Court.

Dated: November 5, 2008
New York, New York

Respectfully submitted,

COUGHLIN DUFFY LLP

By:


JUSTIN N. KINNEY (JNK 8531)
88 Pine Street, 5th Floor
New York, New York 10005
(212) 483-0105
Fax: (212) 480-3899
Attorneys for Craigslist, Inc.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CALVIN GIBSON,

Plaintiff,

-against-

CRAIGSLIST, INC.,

Defendant.

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**DECLARATION OF JUSTIN N.
KINNEY, ESQ., IN SUPPORT OF
MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

Justin N. Kinney declares under penalty of perjury that the following is true and correct:

1. I am a member of Coughlin Duffy LLP, attorneys for Craigslist, Inc. ("Movant") in the above-captioned action. I submit this declaration pursuant to Local Rule 1.3c in support of Movant's application for an Order granting Elizabeth L. McDougall, Esq. *pro hac vice* admission to this Court to act as its co-counsel.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in the State of New York in April 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. Elizabeth L. McDougall, Esq. is a member of the law firm of Perkins Coie LLP, 1201 Third Avenue, Suite 4800, Seattle, WA 98101, Telephone: (206) 359-6365, Fax: (206) 359-7365 and has been retained by the Movant to represent it as co-counsel in this action.

4. Elizabeth L. McDougall, Esq. is a member in good standing of the bar of the State of New York and the bar of the State of Washington and has never been disbarred or subject to disciplinary proceedings by any court.

5. I have found Ms. McDougall to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Ms. McDougall is familiar with the facts and circumstances underlying the dispute between the parties.

7. An affidavit from Ms. McDougall together with a Certificate of Good Standing in the State of New York and a Certificate of Good Standing in the State of Washington are attached to this application.

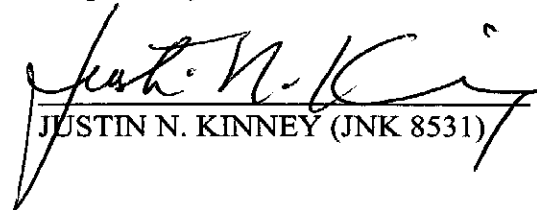
8. No prior application for the relief sought herein has been made.

9. Wherefore, it is respectfully requested that the Court enter an Order, pursuant to Local Rule 1.3(c), allowing Elizabeth L. McDougall, Esq. to argue and try this case, in whole or in part, as co-counsel for Movant.

10. A proposed form of Order is attached hereto as Exhibit A.

Dated: November 5, 2008
New York, NY

Respectfully submitted,


JUSTIN N. KINNEY (JNK 8531)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CALVIN GIBSON,

Plaintiff,

-against-

CRAIGSLIST, INC.,

Defendant.

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**ORDER GRANTING MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

Upon reading and consideration of the papers submitted in support of the Motion To Admit Counsel *Pro Hac Vice* of Elizabeth L. McDougall, Esq. by Defendant, craigslist, Inc., it is

ORDERED that the Motion is hereby granted.

DATED: New York, New York
 _____, 2008

Hon. Richard M. Berman, U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CALVIN GIBSON,

Plaintiff,

-against-

CRAIGSLIST, INC.,

Defendant.

08 Cv. 7735 (RMB)

AFFIDAVIT OF ELIZABETH L.
MCDUGALL, ESQ.

ELIZABETH L. MCDUGALL, ESQ., being duly sworn deposes and says:

1. I am a member in the firm Perkins Coie LLP in Seattle, WA, which has been retained by Craigslist, Inc., to represent them in this action.

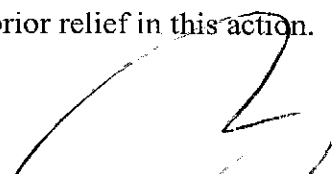
2. I am a member in good standing of the bar of the State of New York and the bar of the State of Washington. I was admitted to practice in the State of New York in 1994 I was admitted to practice in the State of Washington in 1997. I have not been denied admission to, nor have I been disciplined by any court.

3. A Certificate of Good Standing in the State of New York, issued within the previous thirty (30) days is attached hereto as Exhibit A.

4. A Certificate of Good Standing in the State of Washington, issued within the previous thirty (30) days is attached hereto as Exhibit B.

5. I am not now, nor have I been at any time, under suspension or disbarment from any court. I have not been the subject of disciplinary proceeding as a member of the bar in any jurisdiction.

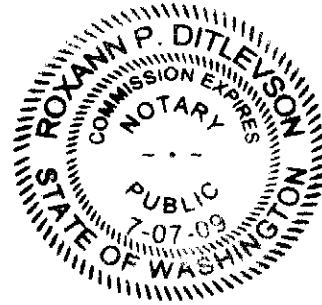
6. I have made no motion for similar prior relief in this action.



Elizabeth L. McDougall, Esq.

Sworn and subscribed to
before me this 31st day of October 2008

Roxann P. Ditlevsen
Notary Public



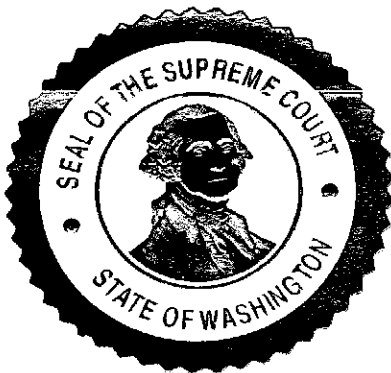
IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION)	BAR NO. 27026
)	
OF)	CERTIFICATE OF GOOD
)	
ELIZABETH L. MCDOUGALL-TURAL)	STANDING
)	
TO PRACTICE IN THE COURTS OF THIS STATE)	
)	

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

ELIZABETH L. MCDOUGALL-TURAL

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on July 18, 1997, and is now and has continuously since that date been an attorney in good standing, and has a current status of active.



IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of said Court this 27th day of October, 2008.

A handwritten signature in black ink, appearing to read "Ronald R. Carpenter".

Ronald R. Carpenter
Supreme Court Clerk
Washington State Supreme Court

Appellate Division of the Supreme Court
of the State of New York
First Judicial Department

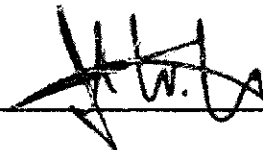
I, John M. McConnell, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

ELIZABETH LESLIE MCDUGALL-TURAL

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on the 31st day of January, 1994 has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my
hand and affixed the seal of this court on

October 23, 2008



Clerk of the Court