

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANWAR, *et al.* v. FAIRFIELD GREENWICH
LIMITED, *et al.*

Master File No. 09-cv-0118 (VM)
(Bhatia) & (Tradewaves)

This Document Relates to: *Bhatia, et al. v.*
Standard Chartered International (USA) Ltd., et al.,
No. 09-CV-2410; *Tradewaves Ltd., et al. v.*
Standard Chartered International (USA) Ltd., et al.,
No. 09-CV-9423

MOTION TO ADMIT COUNSEL
PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for
the Southern District of New York, I, Evelyn H. Seeler, a member in good standing of the Bar of
this Court, hereby moves for an Order allowing the admission *pro hac vice* of


Matthew W. Cheney
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 624-2903
Facsimile: (202) 628-5116

2010-07-09 11:12
S.D. OF N.Y.

Matthew W. Cheney is a member in good standing of the Bars of the State of Maryland
and the District of Columbia. There are no pending disciplinary proceedings against Matthew
W. Cheney in any State or Federal Court.

Dated: New York, New York
July 9, 2010

Respectfully submitted,
CROWELL & MORING LLP

By: 
Evelyn H. Seeler, Esq.
590 Madison Avenue, 20th Floor
New York, New York 10022-2524
Telephone: (212) 223-4000
Facsimile: (212) 223-4134
E-mail: eseeler@crowell.com

Attorneys for Bhatia and Tradewaves Plaintiffs

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AFFIDAVIT OF EVELYN H.
SEELER IN SUPPORT OF
MOTION TO ADMIT COUNSEL
PRO HAC VICE

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

Evelyn H. Seeler, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Crowell & Moring LLP, counsel for Plaintiffs Jitendra Bhatia, Gopal Bhatia, Kishanchand Bhatia, Jayshree Bhatia and Mandakini Gajaria (collectively, “Bhatia”) and Plaintiffs Tradewaves Ltd., Parasram Daryani, Neelam P. Daryani, Vikas P. Daryani, Nikesh P. Daryani, Ashokkumar Damodardas Raipancholia, Dilip Damodardas Raipancholia, Rajeshkumar Damodardas Raipancholia, Kishu Nathurmal Uttamchandani, Prerna Vinod Uttamchandani, Rajendrakumar Patel, Vandna Patel, Arjan Mohandas Bhatia, Kishin Mohandas Bhatia, Suresh M. Bhatia, Bharat Mohandas, and Aarvee Ltd. (collectively, “Tradewaves”). I am familiar with the proceedings in this case.

2. I submit this affidavit based on my personal knowledge of the facts set forth herein and in support of Plaintiffs’ motion to admit Matthew W. Cheney as counsel *pro hac vice* to represent the Bhatia and Tradewaves Plaintiffs in this matter.

3. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law April 22, 1987. 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.

4. I have known Matthew W. Cheney since April 2007.

5. Matthew W. Cheney is counsel at Crowell & Moring LLP in the District of Columbia, and is a member in good standing of the Bar of the State of Maryland and the District of Columbia. Attached hereto as Exhibit A are Certificates of Good Standing for Mr. Cheney issued by the Bars of the State of Maryland and the District of Columbia.

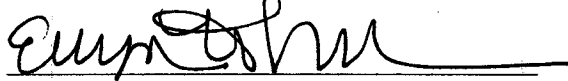
6. I have found Matthew W. Cheney to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

7. Accordingly, I am pleased to move the admission of Matthew W. Cheney, *pro hac vice*.

8. I respectfully submit a proposed Order granting the admission of Matthew W. Cheney *pro hac vice*, to represent Plaintiffs in the above captioned matter, which is attached hereto as Exhibit B.

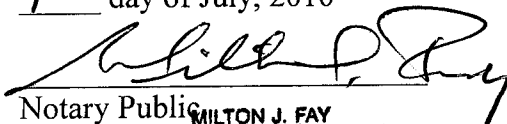
Dated: New York, New York
July 9, 2010

Respectfully submitted,
CROWELL & MORING LLP

By: 
Evelyn H. Seeler, Esq.
590 Madison Avenue, 20th Floor
New York, New York 10022-2524
Telephone: (212) 223-4000
Facsimile: (212) 223-4134
E-mail: eseeler@crowell.com

Attorneys for Bhatia and Tradewaves Plaintiffs

Sworn to before me this
9th day of July, 2010


Notary Public
MILTON J. FAY
Notary Public, State of New York
No. 43-4885058
Qualified in Richmond County
Certificate Filed in New York County
Term Expires: February 17, 2011



District of Columbia Court of Appeals
Committee on Admissions
430 F Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JOY A. CHAPPER, Acting Clerk of the District of Columbia Court of Appeals, do hereby certify that

MATTHEW CHENEY

was on the 2ND day of AUGUST, 1999

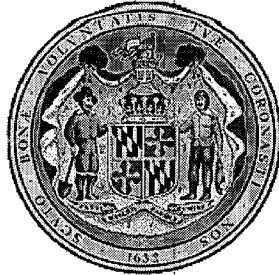
duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on June 23, 2010.

JOY A. CHAPPER, ACTING CLERK

By: 
Deputy Clerk

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the sixteenth day of December, 1997,*

Matthew Ward Cheney

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

In Testimony Whereof, *I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-second day of June, 2010.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANWAR, <i>et al.</i> v. FAIRFIELD GREENWICH LIMITED, <i>et al.</i>	:	Master File No. 09-cv-0118 (VM) (Bhatia) & (Tradewaves)
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Upon the motion of Evelyn H. Seeler, attorney for Plaintiffs Jitendra Bhatia, Gopal Bhatia, Kishanchand Bhatia, Jayshree Bhatia and Mandakini Gajaria (collectively, "Bhatia") and Plaintiffs Tradewaves Ltd., Parasram Daryani, Neelam P. Daryani, Vikas P. Daryani, Nikesh P. Daryani, Ashokkumar Damodardas Raipancholia, Dilip Damodardas Raipancholia, Rajeshkumar Damodardas Raipancholia, Kishu Nathurmal Uttamchandani, Prerna Vinod Uttamchandani, Rajendrakumar Patel, Vandna Patel, Arjan Mohandas Bhatia, Kishin Mohandas Bhatia, Suresh M. Bhatia, Bharat Mohandas, and Aarvee Ltd. (collectively, "Tradewaves"), and the Affidavit of Evelyn H. Seeler in support;

IT IS HEREBY ORDERED that

Matthew W. Cheney
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 624-2903
Facsimile: (202) 628-5116
Email address: mcheney@crowell.com

is admitted to practice *pro hac vice* as counsel for the Bhatia and Tradewaves Plaintiffs in the above captioned case in the United States 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. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.

Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.


Dated: New York, NY
_____, 2010

United States District/Magistrate Judge

CERTIFICATE OF SERVICE

I, Vivian M. Arias, the undersigned, certify under penalty of perjury, that on July 9, 2010, I served by electronic mail, true copies of the Motion to Admit Counsel Pro Hac Vice of Matthew W. Cheney with supporting papers upon all the counsel who have appeared in this action.

Dated: July 9, 2010


Vivian M. Arias