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*Attorneys for Defendants Citco Bank Nederland N.V.  
Dublin Branch and Citco Fund Services (Europe) B.V.*

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ANWAR, et al.

Plaintiffs,

-against-

FAIRFIELD GREENWICH LIMITED, et al

Defendants.

THIS DOCUMENT RELATES TO: All Actions

Anwar et al v. ~~Fairfield Greenwich Limited et al~~

Case No.: 09-CV-00118 (VM) (THK)

**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

FILED COURT  
U.S. DISTRICT COURT  
2009 APR -3 PM 3:40

Doc. 78

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

Elizabeth Izquierdo, Esq.  
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One Biscayne Tower, 15th Floor  
2 South Biscayne Boulevard  
Miami, Florida 33131  
Telephone: (305) 358-3580  
Facsimile: (305) 374-1756

Elizabeth Izquierdo is a member in good standing of the bars of the State of Florida and the U.S. District Court for the Southern District of Florida. There are no pending disciplinary proceedings against Elizabeth Izquierdo in any State or Federal Court.

Dated: New York, New York  
April 3, 2009

Respectfully submitted,

CURTIS, MALLETT-PREVOST, COLT & MOSLE LLP

By: Michael Moscato

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Dublin Branch and Citco Fund Services (Europe) B.V.*

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ANWAR, et al. :  
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 Plaintiffs, : Case No.: 09-CV-00118 (VM) (THK)  
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 :  
 -against- : **AFFIDAVIT OF**  
 : **MICHAEL J. MOSCATO**  
 :  
 FAIRFIELD GREENWICH LIMITED, et al :  
 :  
 :  
 Defendants. :  
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 :  
 THIS DOCUMENT RELATES TO: All Actions :  
 :  
-----X

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

Michael J. Moscato, being duly sworn, deposes and says:

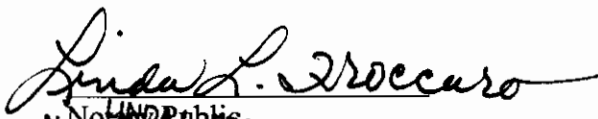
1. I am an attorney duly admitted to practice law before the Courts of the State of New York and the United States District Court for the Southern District of New York. I am a member of the firm Curtis, Mallet-Prevost, Colt & Mosle LLP, counsel for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V. (the "Citco Defendants").

2. I submit this affidavit in support of the Citco Defendants' Motions for Admission of Amanda McGovern and Elizabeth Izquierdo *pro hac vice* pursuant to this Court's Local Rule 1.3(c).
3. Ms. McGovern is a member of the law firm of Gilbride, Heller & Brown, P.A., located in Miami, Florida. She is a member in good standing of the bars of the State of Florida, the U.S. District Courts for the Southern and Middle Districts of Florida, and the U.S. Courts of Appeals for the Eleventh and Federal Circuit and the U.S. Supreme Court. I work closely with Ms. McGovern on the instant matter, and her work is integral to the case.
4. Ms. Izquierdo is a member of the law firm of Gilbride, Heller & Brown, P.A., located in Miami, Florida. She is a member in good standing of the bars of the State of Florida and the U.S. District Court for the Southern District of Florida. I work closely with Ms. Izquierdo on the instant matter, and her work is integral to the case.

WHEREFORE, it is respectfully requested that the Citco Defendants' motion, pursuant to Local Rule 1.3(c), for the admission of Amanda McGovern and Elizabeth Izquierdo to practice before this Court in the above-captioned matter be granted.

  
Michael J. Moscato

Sworn to before me this  
2nd day of April 2009

  
Linda L. Proccaro  
Notary Public  
Notary Public, State of New York  
No. 31-6241000  
Qualified in New York County  
Commission Expires May 31, 2010



# The Florida Bar

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In Re:       594466  
Elizabeth Ann Izquierdo  
Gilbride Heller & Brown, P.A.  
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Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on September 27, 2002.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 25<sup>th</sup> day of March, 2009.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/KLW1:R10

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ANWAR, et al. :  
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 : Plaintiffs, : Case No.: 09-CV-00118 (VM) (THK)  
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 :  
 : -against- : **[PROPOSED] ORDER**  
 : **FOR ADMISSION**  
 : **PRO HAC VICE**  
 :  
 FAIRFIELD GREENWICH LIMITED, et al :  
 :  
 :  
 : Defendants. :  
 :  
 :  
 : THIS DOCUMENT RELATES TO: All Actions :  
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 -----X

Upon the Motion of Michael J. Moscato attorney for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V. and Michael J. Moscato's affidavit in support;

**IT IS HEREBY ORDERED** that

Elizabeth Izquierdo, Esq.  
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One Biscayne Tower, 15th Floor  
2 South Biscayne Boulevard  
Miami, Florida 33131  
Telephone: (305) 358-3580  
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is admitted to practice *pro hac vice* as counsel for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V. 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. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: April \_\_, 2009  
New York, NY

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United States District Judge Victor Marrero

**CERTIFICATE OF SERVICE BY MAIL**

I, JOSEPH F. CLYNE, am an attorney with the law firm of Curtis, Mallet-Prevost, Colt & Mosle LLP and am admitted to practice law in the State of New York.

I hereby certify that on April 3, 2009, I caused a true and correct copy of: (1) Motion to Admit Counsel *pro hac vice*, (2) Affidavit of Michael J. Moscato and (3) Proposed Order for Admission *pro hac vice* to be served by first class mail postage prepaid, upon the recipients on the attached service list:

**SERVICE LIST**

***Anwar et al, v. Fairfield Greenwich Ltd. et al,***  
**Consolidated Case No. 09-cv-00118**

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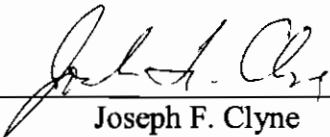
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*Attorneys for Defendants Citco Bank Nederland NV Dublin Branch,  
Citco Fund Services (Europe) BV*

Dated: New York, New York  
April 3, 2009

  
\_\_\_\_\_  
Joseph F. Clyne