

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

In re HERALD, PRIMEO and THEMA  
FUNDS SECURITIES LITIGATION,

Civil Action No. 09 CIV 289 (RMB) (HBP)  
(Consolidated with 09 CIV 2032 and  
09 CIV 2558)

This Document Relates To:

ECF CASE

ALL ACTIONS.

MOTION TO ADMIT COUNSEL, PATRICE L. BISHOP, *PRO HAC VICE*

2011 AUG -4 PM 2:19  
S.D. OF N.Y.

AUG 04 2011

1013247

DN 200-

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, Jules Brody a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Patrice L. Bishop, Esq.  
STULL, STULL & BRODY  
10940 Wilshire Boulevard, Suite 2300  
Los Angeles, CA 900245  
Tel: (310) 209-2468  
Fax: (310) 209-2087  
Email: [service@ssbla.com](mailto:service@ssbla.com)

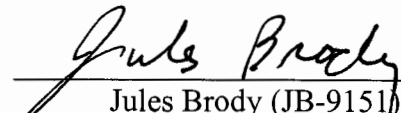
Patrice L. Bishop is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceedings against Patrice L. Bishop in any State or Federal court.

Dated: *AUG 1, 2011*

**STULL, STULL & BRODY**

By:

  
\_\_\_\_\_  
Jules Brody (JB-9151)  
6 East 45<sup>th</sup> Street  
New York, New York 10017  
(212) 687-7230 (Tel)  
(212) 490-2022 (Fax)

**STULL, STULL & BRODY**


Patrice L. Bishop  
Timothy J. Burke  
10940 Wilshire Boulevard  
Suite 2300  
Los Angeles, California 90024  
(310) 209-2468 (Tel)  
(310) 209-2087 (Fax)  
Email: [service@ssbla.com](mailto:service@ssbla.com)

**Lead Counsel for Lead Plaintiff Repex  
Ventures, Plaintiff Dana Trezziova and  
the Proposed Class (*Repex* action only)**

**CERTIFICATE OF SERVICE**

I hereby certify, this \_\_\_\_th day of \_\_\_\_\_, 2011, that I caused a true and correct copy[ies] of the **Motion to Admit Counsel, Patrice L. Bishop, *Pro Hac Vice*; Affidavit of Jules Brody in Support of Motion to Admit Counsel, Patrice L. Bishop, *Pro Hac Vice*; and Order for Admission of Patrice L. Bishop, *Pro Hac Vice* on Written Motion** to be served via First Class Mail and First Class International Mail on all parties listed on the attached service list.

Dated:

  
Melanie Jacobs

## SERVICE LIST

Jules Brody  
[ssbny@aol.com](mailto:ssbny@aol.com)  
Patrick K. Slyne  
[pkslyne@aol.com](mailto:pkslyne@aol.com)  
STULL, STULL & BRODY  
6 East 45th Street  
New York, NY 10017  
Tel: (212) 687-7230  
Fax: (212) 490-2022

**Lead Counsel for Lead Plaintiff Repex  
Ventures and the Class  
(Repex action only)**

Joshua S. Devore  
[jdevore@cohenmilstein.com](mailto:jdevore@cohenmilstein.com)  
S. Douglas Bunch  
[dbunch@cohenmilstein.com](mailto:dbunch@cohenmilstein.com)  
COHEN MILSTEIN SELLERS & TOLL  
PLLC  
1100 New York Avenue, N.W.  
Suite 500, West Tower  
Washington, DC 20005  
Tel: (202) 408-4600  
Fax: (202) 408-4699

Catherine A. Torell  
[ctorell@cohenmilstein.com](mailto:ctorell@cohenmilstein.com)  
COHEN MILSTEIN SELLERS & TOLL  
PLLC  
150 East 52nd Street  
30th Floor  
New York, NY 10022  
Tel: (212) 838 7797  
Fax: (212) 838-7745

**Counsel for Lead Plaintiff Dr. Schmucl  
Cabilly and Plaintiff Korea Exchange  
Bank and Lead Counsel for the Class**

Jacob Sabo, Esq.  
The Tower  
# 3 Daniel Frisch St.  
Tel Aviv Israel  
Tel: (972) 36078888  
Fax: (972) 36078889

**Of Counsel for Lead Plaintiff Shmucl  
Cabilly**

Brian P. Murray  
Gregory B. Linkh  
MURRAY, FRANK & SAILER LLP  
275 Madison Avenue  
Suite 801  
New York, NY 10016  
Tel: (212) 682-1818  
Fax: (212) 682-1892

**Counsel for Plaintiff and the Class**

Frank A. Bottini  
[frankb@johnsonbottini.com](mailto:frankb@johnsonbottini.com)  
Albert Y. Chang  
[albertc@johnsonbottini.com](mailto:albertc@johnsonbottini.com)  
CHAPIN FITZGERALD SULLIVAN &  
BOTTINI LLP  
550 West C Street  
Suite 2000  
San Diego, CA 92101  
Tel: (619) 241-4810  
Fax: (619) 955-5318

**Lead Counsel for Plaintiff and the Class**

Samuel H. Rudman  
[srudman@rgrdlaw.com](mailto:srudman@rgrdlaw.com)  
David A. Rosenfeld  
[drosenfeld@rgrdlaw.com](mailto:drosenfeld@rgrdlaw.com)  
ROBBINS GELLER RUDMAN  
& DOWD LLP  
52 Duane Street, 7th Floor  
New York, NY 10007  
Tel: (212) 693-1058  
Fax: (212) 693-7423

Keith F. Park  
[keithp@rgrdlaw.com](mailto:keithp@rgrdlaw.com)  
James I. Jaconette  
[jamesj@rgrdlaw.com](mailto:jamesj@rgrdlaw.com)  
ROBBINS GELLER RUDMAN  
& DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Tel: (619) 231-1058  
Fax: (619) 231-7423

- and -

Jack Reise  
197 South Federal Highway  
Suite 200  
Boca Raton, FL 33432

**Counsel for Plaintiff and the Class**

Robert S. Schachter  
ZWERLING, SCHACHTER &  
ZWERLING  
41 Madison Avenue  
New York, NY 10010  
Tel: (212) 223-3900  
Fax: (212) 371-5969

Dennis H. Tracey, III  
[dennis.tracey@hoganlovells.com](mailto:dennis.tracey@hoganlovells.com)  
Sanford M. Litvack  
[sandy.litvack@hoganlovells.com](mailto:sandy.litvack@hoganlovells.com)  
Lisa J. Fried  
[lisa.fried@hoganlovells.com](mailto:lisa.fried@hoganlovells.com)  
HOGAN LOVELLS US LLP  
875 Third Avenue  
New York, New York 10022  
Tel: (212) 918-3000  
Fax: (212) 918-3100

**Counsel for Defendant  
PricewaterhouseCoopers, a Bermuda  
Partnership**

Mitchell J. Auslander  
[mauslander@willkie.com](mailto:mauslander@willkie.com)  
WILLKIE FARR & GALLAGHER LLP  
787 Seventh Avenue  
New York, New York 10019  
Tel: (212) 728-8000  
fax: (212) 728-8111

**Counsel for William Fry**

Thomas G. Rafferty  
[trafferty@cravath.com](mailto:trafferty@cravath.com)  
Antony L. Ryan  
[aryan@cravath.com](mailto:aryan@cravath.com)  
Samira Shah  
[sshah@cravath.com](mailto:sshah@cravath.com)  
CRAVATH, SWAINE & MOORE LLP  
Worldwide Plaza  
825 Eighth Avenue  
New York, NY 10019  
Tel: (212) 474-1000  
Fax: (212) 474-3700

**Counsel for Defendant  
PricewaterhouseCoopers, an Irish  
partnership**

Fraser L. Hunter, Jr.  
[fraser.hunter@wilmer.com](mailto:fraser.hunter@wilmer.com)  
Howard M. Shapiro  
[howard.shapiro@wilmerhale.com](mailto:howard.shapiro@wilmerhale.com)  
Brad E. Konstandt  
[brad.konstandt@wilmerhale.com](mailto:brad.konstandt@wilmerhale.com)  
J. David Zetlin-Jones  
[david.zetlin-jones@wilmerhale.com](mailto:david.zetlin-jones@wilmerhale.com)  
WILMER CUTLER PICKERING HALE &  
DORR LLP  
399 Park Avenue  
New York, NY 10022  
Tel: (212) 230-8800  
Fax: (212) 230-8888

**Counsel for Defendant  
PricewaterhouseCoopers International  
Ltd.**

Michael P. Carroll  
[michael.carroll@davispolk.com](mailto:michael.carroll@davispolk.com)  
James H.R. Windels  
[james.windels@davispolk.com](mailto:james.windels@davispolk.com)  
Michael S. Flynn  
[michael.flynn@davispolk.com](mailto:michael.flynn@davispolk.com)  
James W. Haldin  
[james.haldin@davispolk.com](mailto:james.haldin@davispolk.com)  
DAVIS POLK & WARDWELL LLP  
450 Lexington Avenue  
New York, NY 10017  
Tel: (212) 450-4547  
Fax: (212) 701-5547

**Counsel for Defendant  
PricewaterhouseCoopers LLP**

Isaac M. Neuberger  
[imn@nqgrg.com](mailto:imn@nqgrg.com)  
Price O. Gielen  
[pob@nqgrg.com](mailto:pob@nqgrg.com)  
NEUBERGER, QUINN, GIELEN, RUBIN  
& GIBBER, P.A.  
One South Street  
27th Floor  
Baltimore, MD 21202-3282  
Tel: (410) 332-8510  
Fax: (410) 332-8511

**Counsel for Defendant Sonja Kohn**

Evan A. Davis  
[edavis@cgsh.com](mailto:edavis@cgsh.com)  
Charles J. Keeley  
[cjkeeley@cgsh.com](mailto:cjkeeley@cgsh.com)  
Thomas J. Moloney  
[tmoloney@cgsh.com](mailto:tmoloney@cgsh.com)  
CLEARY GOTTLIEB STEEN &  
HAMILTON LLP  
One Liberty Plaza  
New York, NY 10006  
Tel: (212) 225-2000  
Fax: (212) 225-3999

**Counsel for Defendants HSBC Holdings  
plc, HSBC Securities Services (Ireland)  
Limited, HSBC Institutional Trust  
Services (Ireland) Limited, HSBC  
Securities Services (Luxembourg) S.A.,  
Bank of Bermuda (Cayman) Limited,  
Bank of Bermuda (Luxembourg) S.A.,  
and Bank of Bermuda Limited**

Susan L. Saltzstein  
[Jason.Vigna@Skadden.com](mailto:Jason.Vigna@Skadden.com)  
Jason C. Vigna  
[Jason.Vigna@Skadden.com](mailto:Jason.Vigna@Skadden.com)  
SKADDEN, ARPS, SLATE, MEAGHER &  
FLOM LLP  
Four Times Square  
New York, NY 100365  
Tel: (212) 735-3000  
Fax: (212) 735-2000

**Counsel for Defendants Pioneer  
Alternative Investment Management  
(Dublin) Ltd., Pioneer Global Asset  
Management S.p.A and UniCredit S.p.A**

Keith M. Fleischman  
Hung G. Ta  
FLEISCHMAN LAW FIRM  
565 Fifth Avenue, 7th Floor  
New York, NY 10017  
Tel: (212) 880-9569  
Fax: (917) 591-5245

**Co-Counsel for Defendant UniCredit  
S.p.A.**

David Elbaum  
[delbaum@bruneandrichard.com](mailto:delbaum@bruneandrichard.com)  
BRUNE & RICHARD LLP  
One Battery Park Plaza  
34th Floor  
New York, NY 10004  
Tel: (212) 668-1900  
Fax: (212) 668-0315

**Counsel for Defendant Nigel H. Fielding**

Brett S. Moore  
[bsmoore@pbnlaw.com](mailto:bsmoore@pbnlaw.com)  
PORZIO, BROMBERG & NEWMAN, P.C.  
100 Southgate Parkway  
P.O. Box 1997  
Morristown, NJ 07962-1997  
Tel: (973) 538-4006  
Fax: (973) 538-5146

**Counsel for Messrs. Ferdinand Burg and  
Carlo Reding, the Court Appointed  
Liquidators for Defendant Herald (LUX)**

Jeff G. Hammel  
[jeff.hammel@lw.com](mailto:jeff.hammel@lw.com)  
Daniel Adams  
[daniel.adams@lw.com](mailto:daniel.adams@lw.com)  
LATHAM & WATKINS LLP  
885 Third Avenue  
New York, NY 10022  
Tel: (212) 906-1200  
Fax: (212) 751-4864

**Attorneys for Defendants Hannes Saleta,  
Karl E. Kaniak, Alfred Simon, Johannes  
P. Spalek, Dr. Hans-Peter Tiefenbacher,  
Declan Murray, Alberto La Rocca, and  
Ursula Radel-Leszczyński**

Claudius O. Sokenu  
[claudius.sokenu@aporter.com](mailto:claudius.sokenu@aporter.com)  
John M. Massaro  
[john.massaro@aporter.com](mailto:john.massaro@aporter.com)  
Arthur Luk  
[arthur.luk@aporter.com](mailto:arthur.luk@aporter.com)  
ARNOLD & PORTER LLP  
555 Twelfth Street, NW  
Washington, DC 20004-1206  
Tel: (202) 942-5000  
Fax: (202) 932-5999

**Counsel for Defendant Ernst & Young  
Global Limited**

Richard A. Martin  
[rmartin@orrick.com](mailto:rmartin@orrick.com)  
Patryk J. Chudy  
[pchydy@orrick.com](mailto:pchydy@orrick.com)  
Cindy Yang  
[cyang@orrick.com](mailto:cyang@orrick.com)  
ORRICK, HERRINGTON & SUTCLIFFE  
LLP  
51 West 52nd Street  
New York, NY 10019-6142  
Tel: (212) 506-5188  
Fax: (212) 506-5151

**Counsel for Defendant Ernst & Young  
S.A.**

Jack Yoskowitz  
[yoskowitz@sewkis.com](mailto:yoskowitz@sewkis.com)  
Mandy DeRoche  
[deroche@sewkis.com](mailto:deroche@sewkis.com)  
SEWARD & KISSEL LLP  
One Battery Park Plaza  
New York, NY 10004  
Tel: (212) 574-1200  
Fax: (212) 480-8421

**Counsel for Defendant Michael Wheaton**

William R. Maguire  
[maguire@hugheshubbard.com](mailto:maguire@hugheshubbard.com)  
Kathryn R. Vogel  
[vogelk@hugheshubbard.com](mailto:vogelk@hugheshubbard.com)  
Marc A. Weinstein  
[weinstei@hugheshubbard.com](mailto:weinstei@hugheshubbard.com)  
Gabrielle S. Marshall  
[marshalg@hugheshubbard.com](mailto:marshalg@hugheshubbard.com)  
HUGHES HUBBARD & REED LLP  
One Battery Park Plaza  
New York, NY 10004  
Tel: (212) 837-6000

**Counsel for Defendant Ernst & Young  
(Cayman Islands)**

Patricia M. Hynes  
[patricia.hynes@allenoverly.com](mailto:patricia.hynes@allenoverly.com)  
Andrew Rhys Davies  
[andrew.rhys.davies@allenoverly.com](mailto:andrew.rhys.davies@allenoverly.com)  
Laura Hall  
[laura.hall@allenoverly.com](mailto:laura.hall@allenoverly.com)  
ALLEN & OVERY LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 610-6300  
Fax: (212) 610-6399

**Counsel for Defendant JP Morgan Chase  
& Co.**

David S. Flugman  
[david.flugman@kirkland.com](mailto:david.flugman@kirkland.com)  
Joseph Serino, Jr.  
[joseph.serino@kirkland.com](mailto:joseph.serino@kirkland.com)  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Tel: (212) 446-4800  
Fax: (212) 446-4900

**Counsel for Defendant Herald Fund SPC**

Michael E. Wiles  
[mewiles@debevoise.com](mailto:mewiles@debevoise.com)  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, NY 10022  
Tel: (212) 909-6653  
Fax: (212) 521-7653

**Counsel for Defendants Alberto  
Benbassat, Stephane Benbassat,  
Genevalor, Benbassat & Cie, Gerald J.P.  
Brady, Daniel Morrissey, David T. Smith,  
Thema Asset Management Limited and  
Thema International Fund plc**



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

In re HERALD, PRIMEO and THEMA  
FUNDS SECURITIES LITIGATION,

This Document Relates To:

ALL ACTIONS.

Civil Action No. 09 CIV 289 (RMB) (HBP)  
(Consolidated with 09 CIV 2032 and  
09 CIV 2558)

**ECF CASE**

**AFFIDAVIT OF JULES BRODY IN SUPPORT OF MOTION TO ADMIT COUNSEL,  
PATRICE L. BISHOP, *PRO HAC VICE***

State of New York            )  
  )  
County of New York         )

JULES BRODY, being duly sworn, hereby deposes and says as follows:

1.       I am an attorney with the firm of Stull, Stull & Brody, counsel for Lead Plaintiff Repex Ventures S.A. in this matter. 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 Plaintiff's motion to admit Patrice L. Bishop as counsel *pro hac vice* to represent Lead Plaintiff Repex Ventures S.A. 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 on June 29, 1964. 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.       I have known Miss Bishop since 1997.

4.       Miss Bishop is an associate of Stull, Stull & Brody in the Los Angeles, California office.

5.       I have found Miss Bishop 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. Accordingly, I am pleased to move the admission of Patrice L. Bishop, *pro hac vice*.

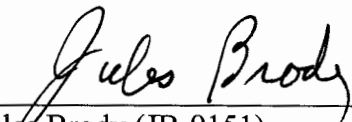
7. I respectfully submit a proposed order that the motion to admit Patrice L. Bishop, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Patrice L. Bishop, *pro hac vice*, to represent Lead Plaintiff Repex Ventures S.A. in the above captioned matter, be granted.

Dated: August 1, 2014  
City, State: New York, NY  
Notarized: Mark Levine

MARK LEVINE  
Notary Public, State of New York  
No. 24-02LE4760335  
Qualified in Westchester County  
Commission Expires March 30, 19  
2014

Respectfully submitted,

  
\_\_\_\_\_  
Jules Brody (JB-9151)



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

July 21, 2011

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, PATRICE LYN BISHOP, #182256 was admitted to the practice of law in this state by the Supreme Court of California on June 3, 1996; 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 black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records

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

In re HERALD, PRIMEO and THEMA  
FUNDS SECURITIES LITIGATION,

This Document Relates To:

ALL ACTIONS.

Civil Action No. 09 CIV 289 (RMB) (HBP)  
(Consolidated with 09 CIV 2032 and  
09 CIV 2558)

**ECF CASE**

**ORDER FOR ADMISSION OF PATRICE L. BISHOP *PRO HAC VICE*  
ON WRITTEN MOTION**

Upon the motion of Jules Brody, attorney for Lead Plaintiff Repex Ventures S.A. and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that:

Patrice L. Bishop, Esq.  
STULL, STULL & BRODY  
10940 Wilshire Boulevard, Suite 2300  
Los Angeles, CA 900245  
Tel: (310) 209-2468  
Fax: (310) 209-2087  
Email: [service@ssbla.com](mailto:service@ssbla.com)

is admitted to practice *pro hac vice* as counsel for Lead Plaintiff Repex Ventures S.A. 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 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 the Court.

Dated:  
City, State:

---

Honorable Richard M. Berman  
United States District Court Judge