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William L. Mentlik
Charles P. Kennedy
Gregg A. Paradise
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, NJ 07090-1497
Tel: 908.654.5000
Fax: 908.654.7866

OCT 22 2009

Attorneys for Defendant Woodforest National Bank

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GUCCI AMERICA, INC.	:	Civil Action No. 09-6925-HB
	:	
Plaintiff,	:	
	:	
v.	:	District Judge Harold Baer, Jr.
	:	
FRONTLINE PROCESSING CORPORATION;	:	
WOODFOREST NATIONAL BANK;	:	
DURANGO MERCHANT SERVICES LLC d/b/a	:	
NATIONAL BANKCARD SYSTEMS OF	:	
DURANGO, ABC COMPANIES, and JOHN	:	
DOES,	:	
	:	
Defendants.	:	
	:	

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U.S. DISTRICT COURT
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NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE

TO: Robert Weigel, Esq.
Howard S. Hogan, Esq.
Jennifer C. Halter, Esq.
GIBSON, DUNN & CRUTCHER, LLP
200 Park Avenue
New York, NY 10166

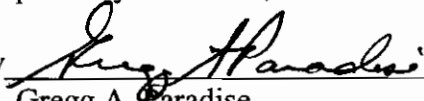
Pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Gregg A. Paradise, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of:

Applicant's Name: WILLIAM L. MENTLIK
Firm Name: Lerner, David, Littenberg, Krumholz & Mentlik, LLP
Address: 600 South Avenue West
City/State/Zip: Westfield, NJ 07090
Phone Number: 908.654.5000
Fax Number: 908.654.7866
E-mail: wmentlik@ldlkm.com

WILLIAM L. MENTLIK is a member in good standing of the Bar of the State of New Jersey. There are no pending disciplinary proceedings against William L. Mentlik in any State or Federal Court. Attached to this motion are certificates of good standing issued by the Supreme Court of New Jersey and Appellate Division of the Supreme Court of the State of New York, Second Judicial Department.

Dated: October 20, 2009
Westfield, New Jersey

Respectfully submitted,

By  _____

Gregg A. Paradise
LERNER DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, NJ 07090
Tel.: 908.654.5000
Fax: 908.654.7866
E-mail: gparadise@ldlkm.com
*Attorneys for Defendant
Woodforest National Bank*

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

GUCCI AMERICA, INC.	:	
	:	Civil Action No. 09-6925-HB
Plaintiff,	:	
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DURANGO MERCHANT SERVICES LLC d/b/a	:	
NATIONAL BANKCARD SYSTEMS OF	:	
DURANGO; ABC COMPANIES; and JOHN	:	
DOES,	:	
	:	
Defendants.	:	
	X	

STATE OF NEW JERSEY)
 ss:
COUNTY OF UNION)

**AFFIDAVIT OF GREGG A. PARADISE IN SUPPORT
OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

I, GREGG A. PARADISE, being duly sworn, hereby deposes and says as follows:

1. I am a partner of the firm of Lerner, David, Littenberg, Krumholz & Mentlik, LLP, counsel for defendant Woodforest National Bank ("WNB") in the above-captioned action. 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 WNB's motion to admit William L. Mentlik as counsel *pro hac vice* to represent defendant in this matter.

2. I am a member in good standing of the bars of the States of New York and New Jersey and was first admitted to practice law on January 13, 1997. 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 William L. Mentlik since July 2005.

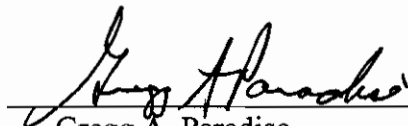
4. Mr. Mentlik is a partner of the firm of Lerner, David, Littenberg, Krumholz & Mentlik, LLP, of Westfield, New Jersey.

5. I have found Mr. Mentlik 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.

6. I respectfully submit simultaneously herewith a proposed order granting the admission of William L. Mentlik, *pro hac vice*, as well as certificates of good standing of Mr. Mentlik from the States of New York and New Jersey.

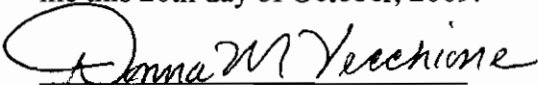
WHEREFORE, it is respectfully requested that the motion to admit William L. Mentlik, *pro hac vice*, to represent the defendant in the above-captioned matter, be granted.

Respectfully submitted,



Gregg A. Paradise
SDNY Bar Code GP-5015

Subscribed and sworn to before
me this 20th day of October, 2009.



Notary Public

DONNA M. VECCHIONE
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires June 24, 2014

Supreme Court of New Jersey

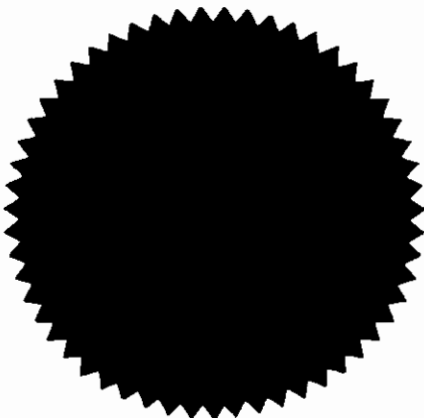


Certificate of Good Standing

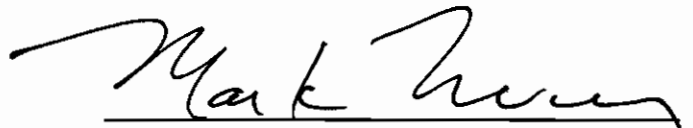
This is to certify that **WILLIAM L MENTLIK**
(No. **013641975**) was constituted and appointed an Attorney at Law of New
Jersey on **December 09, 1975** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if
the Court's records reflect that the attorney: 1) is current with all assessments imposed as a
part of the filing of the annual Attorney Registration Statement, including, but not limited
to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not
suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this
State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-
12.

Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice
law in this State.



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
13TH day of October , 20 09

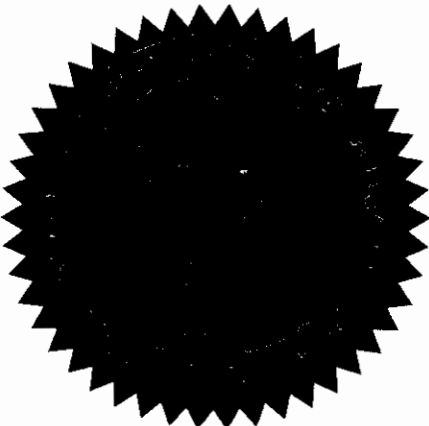

Clerk of the Supreme Court



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, **James Edward Pelzer**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **William T. Mentlik** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 24th day of **October 1973**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-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 Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **October 14, 2009**.



James Edward Pelzer

Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the following documents:

1. NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*;
2. AFFIDAVIT OF GREGG A. PARADISE IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*; and
3. [Proposed] ORDER FOR ADMISSION *PRO HAC VICE* ON WRITTEN MOTION,

is being served upon the following counsel of record this 20th day of October, 2009, as follows:

VIA FIRST-CLASS MAIL

Robert Weigel, Esq.
Howard S. Hogan, Esq.
Jennifer C. Halter, Esq.
Gibson, Dunn & Crutcher, LLP
200 Park Avenue
New York, NY 10166
Attorneys for Plaintiff Gucci America, Inc.

Jeff Oven, Esq.
Herbert I. Pierce III, Esq.
Crowley Fleck PLLP
490 N. 31st Street
Suite 500 TW2
Billings, MT 59101
Attorneys for Defendant Frontline Processing Corporation

Law Offices of
Todd Wengrovsky, PLLC
285 Southfield Road, Box 585
Calverton, NY 11933
Attorneys for Defendant Durango Merchant Services LLC d/b/a National Bankcard Systems of Durango



Gregg A. Paradise

WNB 6.0-001
Civil Action No. 09-6925-HB

William L. Mentlik
Charles P. Kennedy
Gregg A. Paradise
LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
600 South Avenue West
Westfield, NJ 07090-1497
Tel: 908.654.5000
Fax: 908.654.7866

Attorneys for Defendant Woodforest National Bank

**UNITED STATES DISTRICT COURT
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DURANGO MERCHANT SERVICES LLC d/b/a	:	
NATIONAL BANKCARD SYSTEMS OF	:	
DURANGO; ABC COMPANIES; and JOHN	:	
DOES,	:	
	:	
Defendants.	:	
	:	
	:	X

**[Proposed] ORDER FOR ADMISSION
PRO HAC VICE ON WRITTEN MOTION**

Upon the motion of Gregg A. Paradise, attorney for defendant Woodforest National Bank, and said sponsor's affidavit in support;

IT IS HEREBY ORDERED that:

Applicant's Name: WILLIAM L. MENTLIK
Firm Name: Lerner, David, Littenberg, Krumholz & Mentlik, LLP
Address: 600 South Avenue West
City/State/Zip: Westfield, NJ 07090
Phone Number: 908.654.5000
Fax Number: 908.654.7866
E-mail: wmentlik@ldlkm.com

From: Origin ID: KBCA (908) 518-6427
Donna Vecchione
LDLKM, LLP
600 South Ave. West
Westfield, NJ 07090



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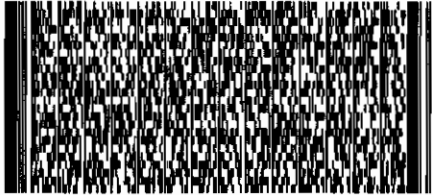
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Dept #

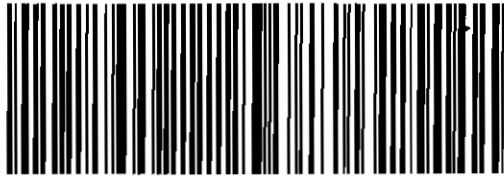
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