

ORIGINAL

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

WIRELESS INK CORPORATION

11-CV-1751 (PKC)

Plaintiff,

- against -

MOTION TO ADMIT COUNSEL

PRO HAC VICE

FACEBOOK, INC.; GOOGLE, INC.;
YOUTUBE; INC.; YOUTUBE, LLC; and
MYSPACE, INC.

Defendants.

MAY 02 2011

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, Arastu K. Chaudhury a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Heidi Keefe
Firm Name: Cooley LLP
Address: 3175 Hanover Street
City/State/Zip: Palo Alto, CA 94304
Phone Number: (650) 843-5000
Fax Number: (650) 849-7400

2011 MAY -2 PM 4:02
U.S. DISTRICT COURT
S.D. OF N.Y.

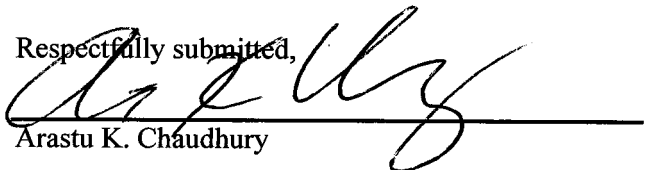
Heidi Keefe is a member in good standing of the Bar of the State of California.

There are no pending disciplinary proceeding against Heidi Keefe in any State or Federal court.

Dated: May 2, 2011

City, State: New York, New York

Respectfully submitted,


Arastu K. Chaudhury

SDNY Bar AC 0101
Firm Name: Cooley LLP
Address: 1114 Avenue of the Americas
City/State/Zip: New York, New York 10036-7798
Phone Number: (212) 479-6000
Fax Number:(212) 479-6275

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WIRELESS INK CORPORATION, :
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 Plaintiff, :
 :
 against :
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 FACEBOOK, INC.; GOOGLE, INC.; :
 YOUTUBE; INC.; YOUTUBE, LLC; and :
 MYSPACE, INC., :
 :
 Defendants. :
----- X

11-CV-1751 (PKC)
**AFFIDAVIT OF
ARASTU K. CHAUDHURY
IN SUPPORT OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

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

Arastu K. Chaudhury, being duly sworn, hereby deposes and says as follows:

1. I am an associate at Cooley LLP, counsel for defendant Facebook, Inc. in the above captioned case. 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 Defendant Facebook, Inc.'s motion to admit Heidi Keefe as counsel *pro hac vice* to represent Facebook, Inc. 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 April 18, 2007. 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 Heidi Keefe since 2010.
4. Heidi Keefe is a partner at Cooley LLP in Palo Alto, California.

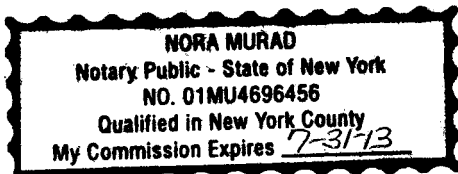
5. I have found Heidi Keefe to be a skilled attorney and a person of integrity. She is experienced in federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Heidi Keefe, *pro hac vice*.
7. Heidi Keefe's Certificate of Standing is attached hereto as Exhibit A.
8. I respectfully submit a proposed order granting the admission of Heidi Keefe, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Heidi Keefe, *pro hac vice*, to represent defendants in the above captioned matter, be granted.

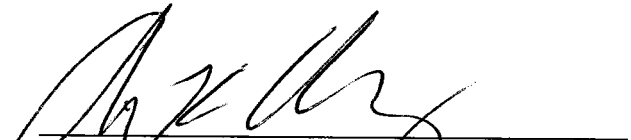
Dated: May 2, 2011
New York, New York

Sworn before me this
2nd day of May, 2011


Notary Public



Respectfully submitted,


Arastu K. Chaudhury
SDNY Bar Code AC 0101



THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

April 26, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, HEIDI LYN KEEFE, #178960 was admitted to the practice of law in this state by the Supreme Court of California on December 7, 1995; 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 cursive script, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WIRELESS INK CORPORATION, :
 :
 Plaintiff, : 11-CV-1751 (PKC)
 :
 against :
 : **[PROPOSED] ORDER**
 : **TO ADMIT COUNSEL**
 : **PRO HAC VICE**
 :
 FACEBOOK, INC.; GOOGLE, INC.; :
 YOUTUBE; INC.; YOUTUBE, LLC; and :
 MYSPACE, INC., :
 :
 Defendants. :
----- X

Upon the motion of Arastu K. Chaudhury, an attorney for Defendant Facebook, Inc., and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name: Heidi Keefe
Firm Name: Cooley LLP
Address: 3175 Hanover Street
City/State/Zip: Palo Alto, CA 94304
Telephone/Fax: (650) 843-5000
Email Address: hkeefe@cooley.com

is admitted to practice *pro hac vice* as counsel for Defendant Facebook, Inc. 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. Counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:
New York, New York

Judge P. Kevin Castel, United States District Court

CERTIFICATE OF SERVICE

I, the undersigned, an attorney at law admitted to practice in the Courts of the State of New York and an associate of the law firm Cooley, LLP hereby affirm that the following statement is true and correct under penalty of perjury:

On Monday, May 02, 2011 the within **Motion to Admit Counsel Pro Hac Vice with attached Affidavit of Arastu K. Chaudhury in Support of Motion to Admit Counsel Pro Hac Vice and Proposed Order to Admit Pro Hac Vice** was served by mail upon the following attorneys of record at the last known address indicated below:

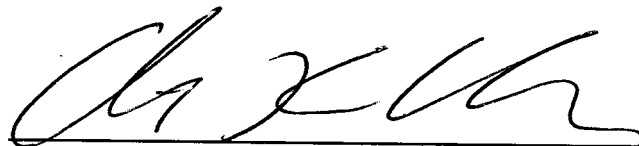
Jeremy S. Pitcock
The Pitcock Law Group
1501 Broadway, 12th Floor
New York, NY 10036
Attorneys for Plaintiff Wireless Ink Corporation

Aaron Chase
White & Case LLP (NY)
1155 Avenue of the Americas
Suite 2040
New York, NY 10036
Attorneys for Defendants Google, Inc., Youtube, Inc. and Youtube, LLC

And

Steven M. Lieberman
Rothwell, Figg, Ernst & Manbeck
1425 K Street N.W. Suite 800
Washington, DC 20005
Attorneys for Defendant MySpace, Inc.

Dated: May 2, 2011


Arastu K. Chaudhury