Kevin H. Bell
Senior Associate General Counsel
For Dispute Resolution
SECURITIES INVESTOR PROTECTION
CORPORATION
805 15th Street, N.W., Suite 800
Washington, D.C. 20005
Telephone: (202) 371-8300

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

BERNARD L. MADOFF INVESTMENT

SECURITIES LLC,

v.

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation: of Bernard L. Madoff Investment Securities LLC,:

Plaintiff,

v.

SAUL B. KATZ, et al.,

Defendants.

Adv. Pro. No. 08-01789 (BRL) SIPA LIQUIDATION (Substantively Consolidated)

(Substantively Consolidated)

Adv. Pro. No. 10-05287 (BRL)

Case No. 1:11-cv-3605 (JSR)

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules for the United States District Courts for the Eastern and Southern Districts of New York, I, Kevin H. Bell, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission <u>pro hac vice</u> of:

Christopher H. LaRosa Associate General Counsel Securities Investor Protection Corporation 805 15th Street, N.W., Suite 800 Washington, D.C. 20005 Telephone: (202) 371-8300

E-mail: <u>clarosa@sipc.org</u>

Christopher H. LaRosa is a member in good sta

Facsimile: (202) 371-6728

Christopher H. LaRosa is a member in good standing of the bars of Maryland and the District of Columbia. There are no pending disciplinary proceedings against Christopher H. LaRosa in any State or Federal Court.

Dated: June ___, 2011 Washington, D.C.

Respectfully submitted,

KEVIN H. BELL

(SDNY Bar No. 1581289)

SECURITIES INVESTOR PROTECTION

CORPORATION

805 15th Street, N.W., Suite 800

Washington, D.C. 20005 Telephone: (202) 371-8300

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Kevin H. Bell Senior Associate General Counsel For Dispute Resolution SECURITIES INVESTOR PROTECTION CORPORATION 805 15th Street, N.W., Suite 800 Washington, D.C. 20005 Telephone: (202) 371-8300

UNITED STATES DISTRICT COURT

| SOUTHERN DISTRICT OF NEW YORK | | | | | |
|---|--|--|--|--|--|
| SECURITIES INVESTOR PROTECTION CORPORATION, | | | | | |
| Plaintiff-Applicant, v. | Adv. Pro. No. 08-01789 (BRL) SIPA LIQUIDATION | | | | |
| BERNARD L. MADOFF INVESTMENT SECURITIES LLC, | : (Substantively Consolidated) : | | | | |
| Defendant. : | | | | | |
| In re: BERNARD L. MADOFF, | | | | | |
| Debtor. | | | | | |
| IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, | Adv. Pro. No. 10-05287 (BRL) | | | | |
| Plaintiff, | Case No. 1:11-cv-3605 (JSR) | | | | |
| v. : | DECLARATION OF KEVIN H. BELL IN SUPPORT OF MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u> | | | | |
| SAUL B. KATZ, et al., | ADMIT COUNSEL INO HAC VICE | | | | |
| Defendants. | | | | | |
| | | | | | |

PURSUANT TO 28 U.S.C. § 1746, I, Kevin H. Bell, hereby declare as follows:

- 1. I am Senior Associate General Counsel for Dispute Resolution at the Securities Investor Protection Corporation ("SIPC") and am counsel for SIPC in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based upon my personal knowledge of the facts set forth herein and in support of SIPC's motion to admit Christopher H. LaRosa pro hac vice to represent SIPC 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 in1974. 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 Christopher H. LaRosa since February, 2005.
 - 4. Christopher H. LaRosa is Associate General Counsel at SIPC in Washington,
 D.C.
- 5. I have found Mr. LaRosa 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. Accordingly, I am pleased to move the admission of Christopher H. LaRosa, <u>pro</u> hac <u>vice</u>.
- 7. I respectfully submit a proposed order granting the admission of Christopher H. LaRosa, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Christopher H. LaRosa, pro hac vice, to represent SIPC in the above-captioned matter, be granted.

I declare under penalty of perjury that the foregoing is true and correct. Executed this ___ day of June, 2011 in Washington, D.C.

Respectfully submitted,

KEVIN H. BELL

(SDNY Bar No. 1581289)

SECURITIES INVESTOR PROTECTION

CORPORATION

805 15th Street, N.W., Suite 800

Washington, D.C. 20005 Telephone: (202) 371-8300 Facsimile: (202) 371-6728

E-mail: kbell@sipc.org

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|---|--|--|--|--|--------|
| : : Adv. Pro. No. 08-01789 (BRL) : SIPA LIQUIDATION : (Substantively Consolidated). : | | | | | |
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| : Adv. Pro. No. 10-05287 (BRL) : | | | | | |
| : Case No. 1:11-cv-3605 (JSR) | | | | | |
| : : ORDER FOR ADMISSION <u>PRO HAC</u> : <u>VICE</u> ON WRITTEN MOTION | | | | | |
| : VICE ON WRITTEN MOTION | | | | | |
| : : : | | | | | |
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Upon the motion of Kevin H. Bell, attorney for the Securities Investor Protection Corporation ("SIPC"), and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that:

Christopher H. LaRosa Associate General Counsel Securities Investor Protection Corporation 805 15th Street, N.W., Suite 800 Washington, D.C. 20005 Telephone: (202) 371-8300

Facsimile: (202) 371-6728 E-mail: clarosa@sipc.org is admitted to practice pro hac vice for SIPC 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 the 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 Court.

Dated: June _____, 2011 New York, New York

UNITED STATES DISTRICT JUDGE

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District of Columbia Court of Appeals

Committee on Admissions 430 F Street, N.M. — Room 123 Mashington, A. C. 20001 202/879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

| | | | CHRISTOPHER H. | | | LaROSA | | | | |
|--------|---------|-----------------|----------------|---------|-------|--------|------|-------|--------|------|
| was or | the _ | 5 TH | day of | JUNE, | 1995 | | | | | |
| duly | qualifi | ed and | admitted | as an | attor | ney | and | coun | selor | and |
| entitl | ed to | practi | ce before | this | Court | and | is, | on | the | date |
| indica | ated be | low, an | active men | mber in | good | stand | ding | of th | nis Ba | ar. |

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City Washington, D.C., on June 13, 2011.

JULIO A. CASTILLO Clerk of the Court

By: Ruche Cerl
Deputy Clerk

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK SECURITIES INVESTOR PROTECTION CORPORATION, Plaintiff-Applicant, Adv. Pro. No. 08-01789 (BRL) v. SIPA LIQUIDATION (Substantively Consolidated) BERNARD L. MADOFF INVESTMENT SECURITIES LLC, Defendant. In re: BERNARD L. MADOFF, Debtor. IRVING H. PICARD, Trustee for the Liquidation: Adv. Pro. No. 10-05287 (BRL) of Bernard L. Madoff Investment Securities LLC, : Plaintiff, Case No. 1:11-cv-3605 (JSR) v. CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that a true and correct copy of each of the following:

SAUL B. KATZ, et al.,

Defendants.

- (1) MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u> regarding Christopher H. LaRosa;
- (2) DECLARATION IN SUPPORT OF MOTION TO ADMIT COUNSEL <u>PRO HAC VICE</u> regarding Christopher H. LaRosa;
- (3) Proposed ORDER FOR ADMISSION <u>PRO HAC VICE</u> ON WRITTEN MOTION regarding Christopher H. LaRosa; and
- (4) Certificate of Good Standing regarding Christopher H. LaRosa from the District of Columbia Court of Appeals

was served upon counsel for the parties who receive electronic service by ECF and by first class United States mail, postage prepaid, this **2** day of June, 2011 to those parties set forth on Exhibit A.

KEVIN H. BELL

Schedule A

Irving H. Picard v. Saul B. Katz, *et al.*, Adversary Proceeding No. 10-5287 (BRL) (SDNY)

By Electronic Mail and U.S. Mail:

Attorneys for Defendant Irving H. Picard

David J. Sheehan, Esquire

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Email: bhaa@bakerlaw.com

Attorneys for Defendant Saul B. Katz et al.

(representing defendants listed on Schedule B)

Dana M. Seshens, Esquire

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By U.S. Mail:

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Internal Revenue Service Centralized Insolvency Operation Post Office Box 21126 Philadelphia, PA 19114

U.S. Department of Justice, Tax Division Box 55 Ben Franklin Station Washington, DC 20044

Alan Nisselson, Esq. Windels Marx Lane & Mittendorf, LLP 156 West 56th Street New York, NY 10019