IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

| |) |
|-------------------------------------|-------------------------------|
| Heather Kimel, class |) |
| representative on behalf of herself |) Civil Action No.: 11-cv-488 |
| and others similarly situated, |) |
| |) Judge Sara Lioi |
| Plaintiff, |) |
| |) MOTION FOR PRO HAC VICE |
| V. |) FOR CHRISTOPHER M. YOUNG |
| |) |
| Groupon, Inc. and Nordstrom, Inc., |) |
| |) |
| Defendants. |) |

Defendants, Groupon, Inc. and Nordstrom, Inc. (collectively, referred to herein as "Defendants"), by and through their undersigned counsel, hereby move this Court, pursuant to Local Rule 83.5(h) of the United States District Court for the Northern District of Ohio, for the admission *pro hac vice* of Christopher M. Young, so that he may appear and participate in this case. The reasons supporting this Motion are more fully set forth in the attached Affidavit of Christopher Young, which is incorporated herein by reference.

As established by the attached Affidavit, Christopher M. Young (California Bar No. 163319) is a member in good standing of the courts to which he is admitted. Further, Christopher Young agrees to be bound by the Local Rules of this District and Orders of this Court.

For the foregoing reasons, counsel for Defendants respectfully requests that this Court enter an Order granting the admission *pro hac vice* of Christopher M. Young.

Date: April 13, 2011 By: s/Peter M. Ellis

Peter M. Ellis, Ohio Bar No. 0070264

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One of the Attorneys for Defendants Groupon, Inc. and Nordstrom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of April, 2011, a copy of the foregoing **MOTION FOR PRO HAC VICE FOR CHRISTOPHER M. YOUNG** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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Additionally, we have this 13th day of April, 2011 served the following non-ECF admitted parties with a true and correct copy of the **MOTION FOR PRO HAC VICE FOR CHRISTOPHER M. YOUNG** by regular first class mail in postage prepaid envelopes

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addressed as follows: