

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Peermusic, III, Ltd., Songs of Peer, Ltd.,)	
Peer International Corp., Peermusic)	Civil Action No. 2:09-cv-1137
Ltd., PSO Ltd., Southern Music)	
Publishing Co., Inc., WB Music Corp.,)	
Warner-Tamerlane Publishing Corp.,)	
Unichappell Music, Inc., Windswept)	
Holdings LLC, T/Q Music, Inc., Hitco)	
Music Publishing, LLC and Bug Music,)	
Inc.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
Motive Force LLC and Sean Colombo,)	
)	
)	
)	
<i>Defendants.</i>)	

MOTION FOR ADMISSION *PRO HAC VICE* OF ROSS J. CHARAP

Counsel for Plaintiffs Peermusic, III, Ltd., Songs of Peer, Ltd., Peer International Corp., Peermusic Ltd., PSO Ltd., Southern Music Publishing Co., Inc. (collectively “Peermusic”), WB Music Corp., Warner-Tamerlane Publishing Corp., Unichappell Music, Inc. (collectively “Warner/Chappell”), Windswept Holdings LLC, T/Q Music, Inc., Hitco Music Publishing, LLC and Bug Music, Inc. (collectively “Bug”) respectfully moves this Court for permission allowing Ross J. Charap to appear and participate in this action *pro hac vice*, and, in support of this Motion, states as follows:

1. Ross J. Charap is a partner with the law firm of Moses & Singer LLP in New York, New York.
2. As indicated by the attached affidavit, Mr. Charap is admitted into practice and in good standing before the courts of the following jurisdictions: the United States District Court

for the Southern District of New York and the United States District Court for the Eastern District of New York. See Ex. A.

3. Mr. Charap is counsel for Plaintiffs, is familiar with the above-captioned lawsuit, and will be actively associated with Babst, Calland, Clements & Zomnir, P.C. as co-counsel for Plaintiffs. See Exhibit A.

4. Mr. Charap has certified that he has read, knows and understands the Local Rules of Court for the Western District of Pennsylvania and agrees to comply with said rules. See Exhibit A.

5. Mr. Charap has certified that he is a registered user of ECF in the United States District Court for the Western District of Pennsylvania. See Exhibit A.

WHEREFORE, counsel for Plaintiffs request that this Court grant the Motion for Admission *Pro Hac Vice* of Ross J. Charap.

Respectfully submitted,

**BABST, CALLAND, CLEMENTS &
ZOMNIR, P.C.**

Date: September 9, 2009

By: /s/ David E. White
David E. White (Pa. I.D. # 59659)
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- and -

MOSES & SINGER LLP

Paul M. Fakler (NY Bar No. 2940435)

(*pro hac* admission pending)

Ross J. Charap (NY Bar No. 1117381)

(*pro hac* admission pending)

Kandis M. Koustenis (NY Bar No. 2502789)

(*pro hac* admission pending)

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing **MOTION FOR ADMISSION *PRO HAC VICE*** was served this 7th day of September, 2009 via U.S. mail on the following:

Motive Force LLC
224 Adams Pointe Boulevard, Unit 3
Mars, PA 16046-4663

Sean Colombo
224 Adams Pointe Boulevard, Unit 3
Mars, PA 16046-4663

/s/ David E. White

David E. White

Pa. I.D. No. 59659