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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON**

JAMES S. GORDON, JR., an individual  
residing in Benton County, Washington,

Plaintiffs

vs.

IMPULSE MARKETING GROUP, INC.,  
a Nevada Corporation,

Defendants

NO. CV-04-5125-FVS

**MOTION TO PARTICIPATE  
PRO HAC VICE**

Without Oral Argument

The Defendant now moves for permission by this Court for the participation of Sean A. Moynihan as Pro Hac Vice in the above-entitled matter as counsel for the Defendant. This motion is brought by attorney Floyd E. Ivey, Washington State Bar Association No. 6888, who resides in and has an office in this state, is admitted to practice in this Court and who is joined of record in the appearance for the Defendant. This motion is supported by the Declaration of Sean A. Moynihan supporting the Motion to Participate as Pro Hac Vice.

This motion is accompanied by a filing fee of \$100 for application to participate as pro hac vice.

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Dated: February 10, 2005

LIEBLER, IVEY, CONNOR, BERRY & ST. HILAIRE

By s/ FLOYD E. IVEY  
FLOYD E. IVEY, WSBA#6888  
Attorneys for Defendant

I hereby certify that a copy of the foregoing was  
sent via facsimile this \_\_\_\_ day of February, 2005, to:

Douglas E. McKinley, Jr.  
Fax: 628-2307

s/ Floyd E. Ivey  
FLOYD E. IVEY