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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

MARIA DEGENNARO :
Plaintiff, :
vs. :
NETEXIT, INC. f/k/a EXPANETS, INC., :
NETEXIT OF NORTH AMERICA, LLC :
f/k/a EXPANETS OF NORTH AMERICA, :
LLC and AVAYA LLC, :
Defendants. :

C.A. NO. 3:03-CV-940 (RNC)

FILED
2004 APR 30 P 12:04
U.S. DISTRICT COURT
HARTFORD, CT.

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 83.1(d), the undersigned hereby moves the Court to admit Daniel A. Rizzi, Esq. pro hac vice for the purpose of representing Defendant AVAYA LLC ("Defendant") in addition to counsel of record in the instant lawsuit. In support of this Motion, the undersigned represents that:

1. The undersigned, Stacie Boeniger Collier, is an attorney with the firm of Nixon Peabody LLP, City Place, 185 Asylum Street, Hartford, Connecticut, 06105. Stacie Boeniger Collier has been a member in good standing of the Bars of the United States District Court for the District of Connecticut and of the State of Connecticut since 1998 and 1997, respectively.

2. Daniel A. Rizzi is a partner with the firm of Nixon Peabody LLP, 990 Stewart Avenue, Garden City, New York 11590; 516-832-7594; drizzi@nixonpeabody.com. Mr. Rizzi joined the firm in July 1995, and has been a member in good standing of the Bar of the State of New York since June 1982.

3. Mr. Rizzi is also admitted to practice in the United States District Courts for Southern and Eastern Districts of New York.

4. Mr. Rizzi has expertise in the field of management labor and employment law, and regularly represents Avaya Inc. in connection with such matters. This case involves claims of employment discrimination and retaliation, as well as Avaya LLC purported liability as a "successor" to the other named defendants. Mr. Rizzi's admission to the bar in connection with this action would be of significant benefit to Defendant Avaya LLC.

5. The undersigned believes Mr. Rizzi to be of good character and knows of no reason why this Court should not grant this Motion.

6. Mr. Rizzi has not been denied admission or disciplined in accordance with Rule 83.2 of the Local Rules nor has Mr. Rizzi been denied admission or disciplined by any other Court.

WHEREFORE, based upon the representations stated above, and the attached affidavit, the undersigned requests that Daniel A. Rizzi be admitted pro hac vice before this Court as co-counsel for Defendant Avaya LLC.

DEFENDANT AVAYA LLC,

BY: Stacie F. Collier
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April 2004, I sent a true copy of this Motion For Admission Pro Hac Vice, via first-class mail, postage prepaid, to James E. Miller, Esq., Shepherd Finkleman Miller & Shah, LLC, Attorneys for Plaintiff; and to Christopher L. Brigham, Esq., Updike, Kelly & Spellacy, P.C., Attorneys for Defendants NETEXIT, INC. f/k/a EXPANETS, INC. and NETEXIT OF NORTH AMERICA, LLC f/k/a EXPANETS OF NORTH AMERICA.

Stacie F. Collier
Stacie Boeniger Collier, Esq.