

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 09-81255-Civ-DIMITROULEAS / SNOW

MARSHA G. RIVERNIDER,  
ROBERT H. RIVERNIDER, and  
CHARLES EDWARD LINCOLN, III,

Plaintiffs,

vs.

U.S. BANK NATIONAL ASSOCIATION,  
As Trustee for the C-Bass Mortgage Loan  
Asset-Backed Certificates, Series 2006-CBS,  
and all John & Jane Does, 1-10,

Defendants.

**MOTION FOR LIMITED APPEARANCE *PRO HAC VICE*,  
CONSENT TO DESIGNATION AND REQUEST TO ELECTRONIC FILINGS**

In accordance with Local Rule 4B of the Special Rules governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission of Philip J. Berg, Esquire, for purposes of limited appearance as Counsel on behalf of Plaintiff, Charles Edward Lincoln, III herein, in the above-styled case only, and pursuant to Rule 2B, Southern District of Florida, CM/ECF Administrative Procedures, to permit Philip J. Berg, Esquire to receive electronic filings in this case, and in support thereof states as follows:

1. Philip J. Berg, Esquire is not admitted to practice in the Southern District of Florida and is a member in good standing of the Pennsylvania Bar and the United States District Court for the Eastern District of Pennsylvania.

2. Movant, Inger Garcia, Esquire of the Law Firm of Inger Garcia, P.O. Box 11933, Fort Lauderdale, Florida 33339-1933, telephone number (954) 894-9962 is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Inger Garcia, Esquire consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures for the limited purpose of the Order to Show Cause hearing set for January 12, 2010. See Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Philip J. Berg, Esquire has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4B is attached hereto.

4. Philip J. Berg, Esquire, by and through designated counsel and pursuant to Section 2B, Southern District of Florida, CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Philip J. Berg, Esquire at email address: [philjberg@gmail.com](mailto:philjberg@gmail.com).

WHEREFORE, Inger Garcia, Esquire moves this Court to enter an Order permitting Philip J. Berg, Esquire to appear before this Court on behalf of Plaintiff, Charles Edward Lincoln, III for the limited purpose of the Order to Show Cause hearing set for January 12, 2010 for all purposes relating to the proceedings pertaining to the Order to Show Cause set before the

Court on January 12, 2010 in the above-styled matter and directing the Clerk to provide notice of electronic filings to Philip J. Berg, Esquire.

Respectfully submitted,



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*Attorney for Plaintiff,  
Charles Edward Lincoln, III*

Dated: January 12, 2010