

NOV 01 2011

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

DOC # 100

UNITED STATES OF AMERICA

Plaintiff,

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

-against-

11-CV-2564 (LBS)

POKERSTARS, ET AL.

Defendants.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Jonathan Harris, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of the following applicant, in order to represent the Defendant and Claimant, Christopher Ferguson:

Ian J. Imrich  
Law Offices of Ian J. Imrich, Esq.  
*A Professional Corporation*  
10866 Wilshire Boulevard, Suite 1240  
Los Angeles, California 90024  
310.481.2258 (Voice)  
310.481.4475 (Fax)  
[ian@ijilaw.com](mailto:ian@ijilaw.com)

As set forth in the annexed declaration, Mr. Imrich is a member in good standing of the Bar of the State of California, and there are no pending disciplinary proceeding against him any


Handwritten: 11-800-465-4102 07/14

2011 NOV 1 PM 4:34  
S.D. OF N.Y.

State or Federal court. Further, he has been retained to represent Defendant/Claimant Christopher Ferguson in this proceeding.

Dated: November 1, 2011  
New York, NY

Respectfully submitted,

  
Jonathan Harris  
Harris, Cutler & Houghteling LLP  
111 Broadway, Suite 402  
New York, NY 10006  
Ph: 212-397-3700  
Email: jon@harriscutler.com

**CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2011, I caused the foregoing (1) Motion to Admit Ian J. Imrich, *Pro Hac Vice*, (2) Affidavit of Jonathan Harris in support thereof, and (3) Proposed Order to be served upon the following counsel First Class U.S. Mail:

Assistant United States Attorney Jason Harris Cowley  
Office of the United States Attorney, S.D.N.Y.  
One St. Andrew's Plaza  
New York, NY 10007

*Attorneys for the Plaintiff United States of America*

  
\_\_\_\_\_  
JONATHAN HARRIS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

Plaintiff,

-against-

**DECLARATION OF  
JONATHAN HARRIS  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
*PRO HAC VICE***

11-CV-2564 (LBS)

POKERSTARS, ET AL.

Defendants.

---

Jonathan Harris declares under penalty of perjury:

1. I am a member of Harris, Cutler & Houghteling LLP, counsel for Defendant and Claimant Christopher Ferguson in the above captioned case. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Mr. Ian J. Imrich as counsel *pro hac vice* to represent Mr. Christopher Ferguson in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mr. Imrich since 2011. Mr. Imrich is a member of the Law Offices of Ian J. Imrich, Esq. and a member in good standing of the Bar of California, as evidenced by the attached Certificate of Good Standing, annexed hereto as Exhibit A.

4. I have found Mr. Imrich to be a skilled attorney and a person of integrity. He is experienced in federal practice and familiar with the Federal Rules of Procedure.
5. Accordingly, I am pleased to move the admission of Ian J. Imrich, *pro hac vice*.
6. I respectfully submit a proposed order granting the admission of Ian J. Imrich *pro hac vice*, which is annexed hereto as Exhibit B.

Dated: November 1, 2011  
New York, NY

  
Jonathan Harris  
Harris, Cutler & Houghteling LLP  
111 Broadway, Suite 402  
New York, NY 10006  
Ph: 212-397-3700  
Email: jon@harriscutler.com



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

October 14, 2011

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, IAN JOSHUA IMRICH, #147010 was admitted to the practice of law in this state by the Supreme Court of California on June 11, 1990; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

UNITED STATES OF AMERICA

Plaintiff,  
-against-

**[PROPOSED] ORDER**

POKERSTARS, ET AL.

11-CV-2564 (LBS)

Defendants.

---

Upon the motion of Jonathan Harris, counsel for Defendant and Claimant Christopher Ferguson, and his declaration in support;

**IT IS HEREBY ORDERED** that

Ian J. Imrich  
Law Offices of Ian J. Imrich, Esq.  
*A Professional Corporation*  
10866 Wilshire Boulevard, Suite 1240  
Los Angeles, California 90024  
310.481.2258 (Voice)  
310.481.4475 (Fax)  
[ian@ijilaw.com](mailto:ian@ijilaw.com)

is admitted to practice *pro hac vice* as counsel for Mr. Ferguson in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: \_\_\_\_\_

---

The Honorable Leonard B. Sand  
United States District Judge  
Southern District of New York