

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,	:	11 Civ. 2564 (LBS)
	:	
Plaintiff,	:	
	:	
vs.	:	MOTION TO ADMIT COUNSEL
	:	<i>PRO HAC VICE</i>
POKERSTARS, et al.	:	
	:	
Defendants;	:	
	:	
ALL RIGHT, TITLE AND INTEREST IN	:	
THE ASSETS OF POKERSTARS, et al.,	:	
	:	
Defendants-in-rem.	:	

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

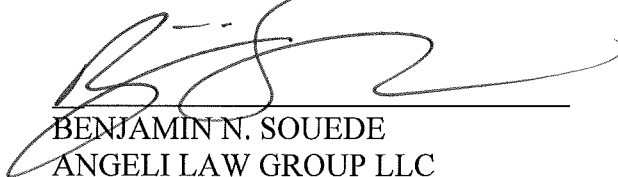
David H. Angeli
Angeli Law Group LLC
121 SW Morrison Street, Suite 400
Portland, OR 97204
Phone: 503-954-2232
Fax: 503-227-0880
david@angelilaw.com

As set forth in the annexed declaration, Mr. Angeli is a member in good standing of the Bar of the States of Oregon, Washington, Maryland, and of the District of Columbia, and there

are no pending disciplinary proceedings against him in any State or Federal court. He has been retained to represent Defendant/Claimant Rafael Furst in this proceeding

Dated: January 11, 2012
Portland, OR

Respectfully submitted,



A handwritten signature in black ink, appearing to read 'B. Souede', is written over a horizontal line.

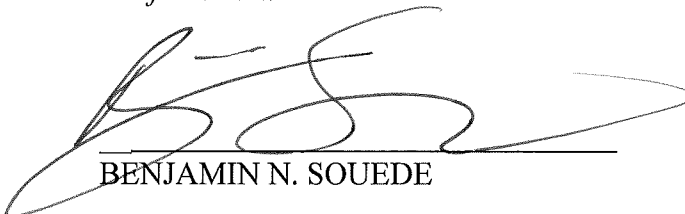
BENJAMIN N. SOUEDE
ANGELI LAW GROUP LLC
121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880
E-mail: Benjamin@angelilaw.com

CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2012, I caused the foregoing (1) Motion to Admit David H. Angeli, *Pro Hac Vice*, (2) Affidavit of Benjamin Souede in support thereof, and (3) Proposed Order to be served upon the following counsel First Class U.S. Mail:

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

Attorneys for the Plaintiff United States of America



BENJAMIN N. SOUEDE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

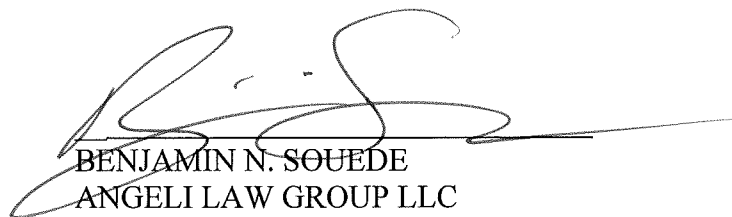
UNITED STATES OF AMERICA,	:	11 Civ. 2564 (LBS)
Plaintiff,	:	
vs.	:	DECLARATION OF BENJAMIN N.
	:	SOUEDE IN SUPPORT OF MOTION
POKERSTARS, et al.	:	TO ADMIT COUNSEL
	:	<i>PRO HAC VICE</i>
Defendants;	:	
ALL RIGHT, TITLE AND INTEREST IN	:	
THE ASSETS OF POKERSTARS, et al.,	:	
Defendants-in-rem.	:	

Benjamin Souede declares under penalty of perjury:

1. I am a member of Angeli Law Group LLC, counsel for Defendant and Claimant Rafael Furst 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. David H. Angeli as counsel *pro hac vice* to represent Mr. Rafael Furst 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 2005. 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. Angeli since 2008. Mr. Angeli is a member of the Angeli Law Group LLC and a member in good standing of the Bars of Oregon, Washington, Maryland and of the District of Columbia, as evidence by the attached Certificates of Good Standing, annexed hereto as Exhibit A.
4. I have found Mr. Angeli to be a skilled attorney and a person of integrity. He is deeply experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.
5. Accordingly, I am pleased to move the admission of David H. Angeli, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of David H. Angeli, *pro hac vice*, which is annexed hereto as Exhibit B.

Dated: January 11, 2012
Portland, OR



BENJAMIN N. SOUEDE
ANGELI LAW GROUP LLC
121 SW Morrison Street, Suite 400
Portland, OR 97204
Telephone: (503) 954-2232
Facsimile: (503) 227-0880
E-mail: Benjamin@angelilaw.com

Oregon State Bar

CERTIFICATE

State of Oregon)
County of Washington) ss.

I, Linn D. Davis, do hereby certify that I am an Assistant Disciplinary Counsel of the Oregon State Bar, and have access to the official files and records of the Oregon State Bar.

The official files and records of the Oregon State Bar indicate:

DAVID H. ANGELI

was admitted to practice law in the State of Oregon by examination and became an active member of the Oregon State Bar on April 19, 2002.


There are no complaints, grievances or disciplinary proceedings presently pending against this member.

No disciplinary action has been taken against this member in the past by the Oregon Supreme Court or the Oregon Disciplinary Board.

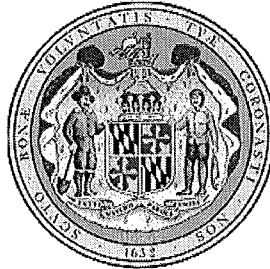
Mr. Angeli is an active member of the Oregon State Bar in good standing, licensed and entitled to practice law in all the courts of the State of Oregon.

DATED this 22nd day of November, 2011.




Linn D. Davis
Assistant Disciplinary Counsel
Oregon State Bar

**Court of Appeals
of Maryland
Annapolis, MD**



CERTIFICATE OF GOOD STANDING

STATE OF MARYLAND, ss:

*I, Bessie M. Decker, Clerk of the Court of Appeals of Maryland,
do hereby certify that on the sixteenth day of December, 1997,*

David Howard Angeli

*having first taken and subscribed the oath prescribed by the Constitution and
Laws of this State, was admitted as an attorney of said Court, is now in good
standing, and as such is entitled to practice law in any of the Courts of said
State, subject to the Rules of Court.*

*In Testimony Whereof, I have hereunto
set my hand as Clerk, and affixed the Seal
of the Court of Appeals of Maryland, this
twenty-eighth day of November, 2011.*

Bessie M. Decker

Clerk of the Court of Appeals of Maryland



District of Columbia Court of Appeals
Committee on Admissions
430 K Street, N.W. — Room 123
Washington, D. C. 20001
202 / 879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

DAVID H. ANGELI

was on the 11TH day of SEPTEMBER, 1998

duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on November 29, 2011.

JULIO A. CASTILLO
Clerk of the Court

By: [Signature]
Deputy Clerk

CERTIFICATION OF CURRENT STATUS

December 5, 2011

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the Washington State Bar Association, **David Howard Angeli**, WSBA ID# **43741** was admitted to the practice of law in this state by the Supreme Court of Washington on **June 3 2011**, and is, as of today's date, an **Active member** of the Washington State Bar Association, **Eligible** to practice law in this state.

This certificate reflects the member's status as of the date stated. Historical information about status, including periods on inactive status, administrative and disciplinary suspensions, disbarments, resignations, etc., are not reflected in this information, but are available through a Certification of Status History. Complete discipline information, including confidential and public information about grievances and disciplinary proceedings, is available with written authorization signed by the member, through a Discipline History Certificate.



Paula C. Littlewood
Executive Director

Washington State Bar Association
1325 Fourth Ave, Suite 600
Seattle, WA 98101-2539
206-443-WSBA

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, Plaintiff, vs. POKERSTARS, et al. Defendants; ALL RIGHT, TITLE AND INTEREST IN THE ASSETS OF POKERSTARS, et al., Defendants-in-rem.	: 11 Civ. 2564 (LBS) : : : [PROPOSED] ORDER : : : : : : : : :
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Upon the motion of Benjamin Souede, counsel for Defendant and Claimant Rafael Furst, and his declaration in support;

IT IS HEREBY ORDERED that

David H. Angeli
Angeli Law Group LLC
121 SW Morrison Street, Suite 400
Portland, OR 97204
Phone: 503-954-2232
Fax: 503-227-0880
david@angelilaw.com

is admitted to practice *pro hac vice* as counsel for Mr. Furst 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 rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at 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