

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

11 CV 02564 (LBS)

UNITED STATES OF AMERICA  
Plaintiff

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

v.

POKERSTARS, *ET AL.*,

Defendants

2011 JUN 29 AM 10:05  
S.D. OF N.Y.  
CLERK COURT

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, Michael Cornacchia, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission, *pro hac vice*, of the following applicant, in order to represent the claimant CHAD ELIE, in the above-captioned case, said applicant

being : William R. Cowden  
Mallon & McCool, LLC  
1776 K Street, N.W., Suite 200  
Washington, DC 20006  
T: 202.393.7088  
F: 202.293.3499  
wcowden@mallonandmcool.com

Mr. Cowden is a member in good standing of the Bar of the District of Columbia, a certification to this effect being annexed to my affidavit in support of this motion, and has been retained to represent the

JUN 29 2011

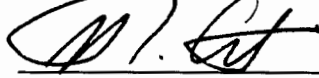
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claimant Chad Elie who filed a verified claim in this case on June 15, 2011. There are no pending disciplinary proceedings against Mr. Cowden in any State or Federal court.

Dated: June 28, 2011  
New York, New York

Respectfully submitted,



Michael T. Cornacchia

Attorney at Law

MC 2444

260 Madison Avenue

22nd Floor

New York, NY 10016

T: 646-278-4297

F: 646-839-2538

[mcornacchia@mtclegal.com](mailto:mcornacchia@mtclegal.com)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
Plaintiff

11-CV-02564 (LBS)

v.

POKERSTARS, *ET AL.*,

Defendants

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**AFFIDAVIT OF  
MICHAEL T. CORNACCHIA  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

State of New York

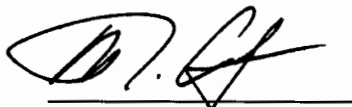
County of New York

Michael T. Cornacchia, being duly sworn, hereby deposes and says as follows:

1. I am familiar with the proceedings in the above-captioned case, and make this affidavit based on my personal knowledge of the facts set forth herein, and in support of my motion to admit William R. Cowden as counsel, *pro hac vice*, to represent claimant Chad Elie in the above-captioned *in rem* civil forfeiture case in which he filed a verified claim on June 15, 2011 [Dkt. 13].
2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice law in 1977. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and in good standing with this Court.
3. I have known Mr. Cowden since 2010 and his law partner, Steven J. McCool, since 2005.
4. Mr. Cowden is a partner at Mallon & McCool, LLC, in Washington, DC, former Assistant United States Attorney for the District of Columbia, former Senior Trial Attorney with the Department of Justice, and member in good standing of the Bar of the District of Columbia, as evidenced by the attached Certificate, marked as Exhibit A.
5. I know Mr. Cowden's reputation to be that of a skilled attorney and person of integrity. He is experienced in Federal practice, including criminal and asset forfeiture matters, and familiar with the Federal Rules of Procedure. Mr. Cowden has been admitted by this Court to represent Chad Elie in the related criminal matter, United States v. Tzvetkoff, et al., 10-cr-0336 (LAK).
6. Accordingly, I am pleased to move the admission of William R. Cowden, *pro hac vice*.
7. I respectfully submit a proposed order granting the admission of William R. Cowden, *pro hac vice*, which is marked as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit William R. Cowden, *pro hac vice*, to represent Claimant Chad Elie in the above-captioned case, be granted.

Respectfully submitted,

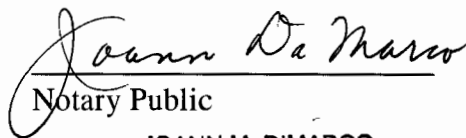


Michael T. Cornacchia  
MC 2444  
260 Madison Avenue  
22nd Floor  
New York, NY 10016  
T: 646-278-4297  
F: 646-839-2538  
mcornacchia@mtclegal.com

Subscribed and sworn to before me this 28<sup>th</sup> day of June 2011:

State of New York            )  
                                          )  
County of New York        )

ss:



Notary Public

JOANN M. DIMARCO  
Notary Public, State of New York  
No. 31-01DI5007831  
Qualified in New York County  
Commission Expires February 8, 2010



District of Columbia Court of Appeals  
Committee on Admissions  
430 F 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


\_\_\_\_\_  
WILLIAM R. COWDEN

was on the 28<sup>TH</sup> day of DECEMBER, 1990

duly qualified and admitted as an attorney and counselor and 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 June 20, 2011.

JULIO A. CASTILLO  
Clerk of the Court

By:   
Deputy Clerk

UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,  
Plaintiff

11 CV 02564 (LBS)

v.

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

POKERSTARS, ET AL.,

Defendants.

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Upon the motion of Michael T. Cornacchia, an attorney admitted to the Bar of this Court,  
and his affidavit in support;

**IT IS HEREBY ORDERED** that

William R. Cowden  
Mallon & McCool, LLC  
1776 K Street, N.W., Suite 200  
Washington, DC 20006  
T: 202.393.7088  
F: 202.293.3499  
wcowden@mallonandmcool.com

is admitted to practice, *pro hac vice*, as counsel for CHAD ELIE, a claimant 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. If this action is assigned to the Electronic Case Filing (ECF) system, Mr. McCool 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

**UNITED STATES DISTRICT COURT  
THE SOUTHERN DISTRICT OF NEW YORK**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of June 2011, I caused (1) this Motion to Admit William R. Cowden, Pro Hac Vice, (2) the Affidavit in support thereof, and (3) a proposed Order to be served on the following counsel for the Plaintiff United States of America, by forwarding the same to them, by First Class U.S. Mail, addressed as follows:

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



\_\_\_\_\_  
Michael T. Cornacchia