

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

1:11-cv-02564-LBS

-----X
UNITED STATES OF AMERICA,

Plaintiff,

**MOTION TO ADMIT
COUNSEL PRO HAC VICE**

-against-

POKERSTARS, ET. AL.,

Defendants.
-----X

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, Dylan Braverman, a member in good standing for the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of the following applicant, in order to represent a party in interest, the Commonwealth of Kentucky, ex. rel. J. Michael Brown, Secretary, Justice and Public Safety Cabinet:

D. Eric Lycan
Steptoe & Johnson, PLLC
1010 Monarch Street, Suite 250
P. O. Box 910810
Lexington, KY 40591-0810
(859) 255-7080
(304) 933-8715 (facsimile)
eric.lycan@steptoe-johnson.com

FILED
U.S. DISTRICT COURT
2011 JUL 18 PM 1:02
S.D. OF N.Y.

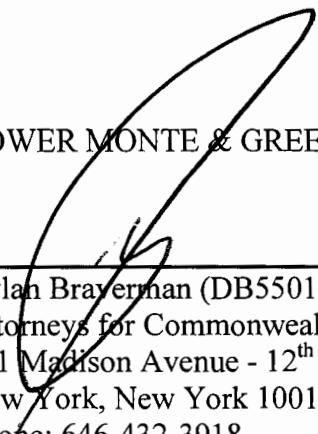
As set forth in the annexed affidavit, Mr. Lycan is a member in good standing of the Bar of the Commonwealth of Kentucky, and there are no pending disciplinary proceedings against him in any State or Federal court. Further, he has been retained by the Commonwealth

2011-81-L-0008-01-81101

of Kentucky, ex. rel. J. Michael Brown, Secretary, Justice and Public Safety Cabinet in this proceeding.

Dated: July 15, 2011
New York, NY

BOWER MONTE & GREENE, P.C.



Dylan Braverman (DB5501)
Attorneys for Commonwealth of Kentucky
261 Madison Avenue - 12th Floor
New York, New York 10016
Phone: 646-432-3918
Fax- 212-599-4560
dbraverman@blawpc.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

1:11-cv-02564-LBS

Plaintiff,

-against-

POKERSTARS, ET. AL.,

Defendants.
-----X

**AFFIDAVIT OF DYLAN
BRAVERMAN IN SUPPORT
OF MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New York)
) SS:
County of New York)

DYLAN BRAVERMAN, being duly sworn, hereby deposes and says the following:

1. I am counsel at Bower Monte & Greene, P.C., counsel for Commonwealth of Kentucky, ex. rel. J. Michael Brown, Secretary, Justice and Public Safety Cabinet (“Kentucky”), a party in interest in the above captioned action. 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 Kentucky’s motion to admit D. Eric Lycan as counsel *pro hac vice* to represent Kentucky 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 2001. 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. Lycan since the beginning of 2011, who is counsel at Steptoe & Johnson, PLLC, and a member in good standing of the bar of the Commonwealth of Kentucky, as evidenced by the attached certificate, annexed hereto as Exhibit “A.”

4. I have found Mr. Lycan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

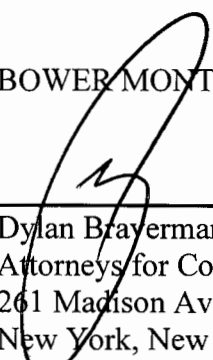
5. Accordingly, I am pleased to move for this Court to admit Mr. Lycan *pro hac vice*.

6. I respectfully submit a proposed Order granting admission of D. Eric Lycan *pro hac vice*, which is annexed hereto as Exhibit "B."

WHEREFORE, it is respectfully requested that the motion to admit D. Eric Lycan *pro hac vice*, to represent Kentucky in the above captioned matter be granted.

Dated: July 15, 2011
New York, New York

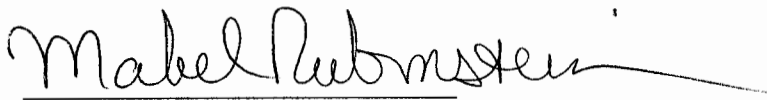
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Dylan Brayerman (DB5501)
Attorneys for Commonwealth of Kentucky
261 Madison Avenue - 12th Floor
New York, New York 10016
Phone: 646-432-3918
Fax- 212-599-4560
dbraverman@blawpc.com

Subscribed and sworn to before me on this 15th day of July, 2011:

State of New York)
) SS:
County of New York)



Notary Public

MABEL RUBINSTEIN
Notary Public, State of New York
No. 01RU6134066
Qualified in Richmond County
Commission Expires September 26, 2013



SUSAN STOKLEY CLARY
Clerk

OFFICE OF THE CLERK
SUPREME COURT OF KENTUCKY
ROOM 209, STATE CAPITOL
700 CAPITAL AVE.
FRANKFORT, KENTUCKY 40601-3488

Telephone:
(502) 564-4720
FAX:
(502) 564-5491

CERTIFICATION

I, Susan Stokley Clary, Clerk of the Supreme Court of Kentucky, do hereby certify the records in this office show that David Eric Lycan having met the necessary requirements for admission to the Bar, took the oath prescribed by the Constitution of this Commonwealth on October 13, 1995, and thereupon was admitted to practice as an attorney before this and all other courts of the Commonwealth of Kentucky, and certify that David Eric Lycan is an attorney at law in good standing, as such, in all the courts of the Commonwealth.

I further certify that the Supreme Court is the Court of highest jurisdiction for the Commonwealth of Kentucky.

Done at the Capitol at Frankfort, Kentucky this 12th day of July, 2011.

SUSAN STOKLEY CLARY
CLERK

By: _____

Charity Kuttell
Deputy Clerk

KENTUCKY BAR ASSOCIATION

514 WEST MAIN STREET
FRANKFORT, KENTUCKY 40601-1812

(502) 564-3795

FAX (502) 564-3225

www.kybar.org

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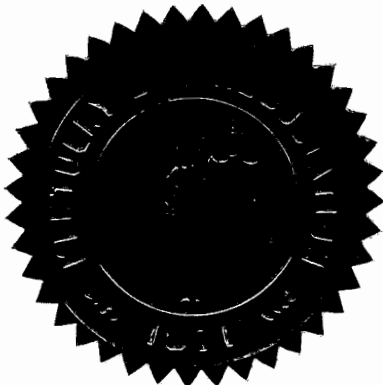
THIS IS TO CERTIFY THAT

DAVID ERIC LYCAN
Steptoe & Johnson, PLLC
1010 Monarch Street, Suite 250
Lexington, Kentucky 40591-0810

Membership No. 86032

is an active member in good standing with the Kentucky Bar Association as required by the Rules of the Supreme Court of Kentucky. Dated this 12th day of July, 2011.

JOHN MEYERS
REGISTRAR



By: *Michele M. Pogrotsky*
Michele M. Pogrotsky, Deputy Registrar

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
UNITED STATES OF AMERICA,

1:11-cv-02564-LBS

Plaintiff,

-against-

POKERSTARS, ET. AL.,

Defendants.
-----X

**ORDER FOR ADMISSION
OF D. ERIC LYCAN *PRO
HAC VICE* ON WRITTEN
MOTION**

Upon the motion of Dylan Braverman, attorney for party in interest, of Kentucky, ex. rel. J. Michael Brown, Secretary, Justice and Public Safety Cabinet ("Kentucky"), and said sponsor attorney's affidavit in support, along with all exhibits and attachments;

IT IS HEREBY ORDERED that

D. Eric Lycan
Steptoe & Johnson, PLLC
1010 Monarch Street, Suite 250
P. O. Box 910810
Lexington, KY 40591-0810
(859) 255-7080
(304) 933-8715 (facsimile)
eric.lycan@steptoe-johnson.com

is hereby admitted to practice *pro hac vice* as counsel for Kentucky 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 the discipline of attorneys. If this action is assigned for the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: _____

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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Certificate of Service

I hereby certify that on this 15th day of July, 2011, I caused this Motion to admit D. Eric Lycan, *pro hac vice*, along with an affidavit in support thereof, and a proposed Order to be forwarded to the following, by first class mail, addressed as follows:

Attorneys for the Plaintiffs United States of America
AUSA Jason Harris Cowley
AUSA Michael Dennis Lockard
Office of the United States Attorney, S.D.N.Y.
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New York, NY 10007

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Bachner & Assoc., P.C.
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New York, NY 10004

Attorneys for Chad Elie
William Rakestraw Cowden
Steven J McChool
Mallon & McCool, LLC
1776 K Street, N.W., Suite 200
Washington, D.C. 20006

Attorneys for Ultra Safe Pay, LLC. and MAS, Inc.
Adam B. Michaels
Jeremy D. Frey
Pepper Hamilton, L.L.P.
1180 Ave. of the Americas, 14th Floor
New York, NY 10036

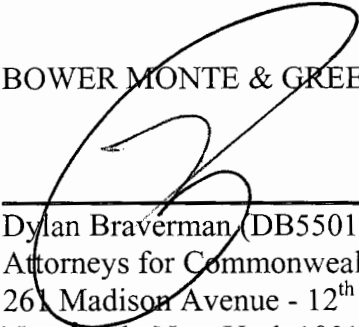
Attorneys for Filco Ltd./ Kolyma Corp. Avv/ Mail Media Ltd./
Pocket Kings Cons. Ltd./ Pocket Kings Ltd./ Vantage Ltd.
Lenard B. Boss
Cozen O'Connor
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Attorneys for Tiltware LLC
Elizabeth Nicole Warin

Elizabeth Nicole Warin
Cozen O'Connor
45 Broadway
New York, NY 10006

Dated: July 15, 2011
New York, NY

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