

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(COLUMBIA DIVISION)

United States of America, Plaintiff, Ex rel., )  
Lynn E. Szymoniak, Plaintiff-Relator, )  
)  
v. )  
American Home Mortgage Servicing, Inc. et al., )  
Defendants. )  
)

Case No. 0:10-cv-01465-JFA

**Motion  
in Support of  
*Pro Hac Vice* Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that Jay W. Eisenhofer be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).
  - Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion:  will likely oppose;  does not intend to oppose
  - Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

No duty of consultation is required because the opposing party is proceeding pro se.

Grant & Eisenhofer P.A.  
485 Lexington Avenue  
New York, NY 10017  
(646) 722-8500  
jeisenhofer@gelaw.com

Richard A. Harpootlian  
s/Richard A. Harpootlian  
Local Counsel for the Relator, Lynn E. Szymoniak  
District of South Carolina  
Federal Bar Number 1730

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
(COLUMBIA DIVISION)

United States of America, Plaintiff, Ex rel. )  
Lynn E. Szymoniak, Plaintiff-Relator, )  
 )  
v. )  
American Home Mortgage Servicing, Inc. et al., )  
Defendants. )  
\_\_\_\_\_ )

Case No. 0:10-cv-01465-JFA

**Application/Affidavit for  
Pro Hac Vice Admission**

(1) Name. Jay W. Eisenhofer

(2) Residence. I reside in the following state: New York

(3) Business Address. I am an attorney and practice law with the following firm:

Firm name: Grant & Eisenhofer P.A.  
Mailing address: 485 Lexington Avenue, New York, NY 10017  
Telephone number: 646-722-8500  
Facsimile number: 646-722-8501  
E-mail address: jeisenhofer@gelaw.com

(4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all applicable federal statutes, laws, and rules, including Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.<sup>1</sup>

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of New York where I regularly practice law. **Attached is my certificate of good standing.**

(6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

<b>Court</b>	<b>Date Admitted</b>	<b>Good Standing</b>	
U.S.D.C., D. of New Jersey,	6/11/1987	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S.D.C., S.D. of New York,	2/01/2005	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S.D.C., D. of Delaware,	5/06/1991; see attached for other courts	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

<sup>1</sup>This District 1 maintains a web site ([www.scd.uscourts.gov](http://www.scd.uscourts.gov)) from which the federal and local rules of procedure and related materials may be obtained.

(7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures?  Yes  No  
(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)

\_\_\_\_\_  
\_\_\_\_\_

(8) Curtailment of Prior *Pro Hac Vice* Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked?  Yes  No  
(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)

\_\_\_\_\_  
\_\_\_\_\_

(9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  Yes  No  
(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)

\_\_\_\_\_  
\_\_\_\_\_

(10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  Yes  No  
(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)

\_\_\_\_\_  
\_\_\_\_\_

(11) Present and Previous *Pro Hac Vice* in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  Yes  No  
(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.

\_\_\_\_\_  
\_\_\_\_\_

(12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:

Richard A. Harpootlian  
Richard A. Harpootlian P.A.  
1410 Laurel Street, Post Office Box 1090  
Columbia, SC 29202  
(803) 252-4848  
rah@harpootlianlaw.com

[Type text]



**Additional Courts in which Jay W. Eisenhofer is admitted:**

U.S.D.C. for the Eastern District of PA	01/29/1987
U.S. Court of Appeals for the 1st Circuit	10/14/2003
U.S. Court of Appeals for the 2d Circuit	09/10/1998
U.S. Court of Appeals for the 3rd Circuit	03/09/1998
U.S. Court of Appeals for the 5th Circuit	05/20/2002
U.S. Court of Appeals for the 9th Circuit	04/28/2008
U.S. Court of Appeals for the 10th Circuit	07/15/1998
State of Pennsylvania	11/12/1986
State of Delaware	12/13/1990
State of New Jersey	06/11/1987
State of New York	10/25/06

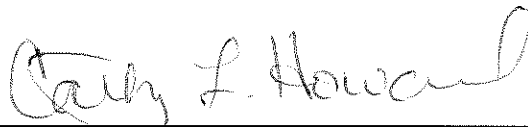
## SUPREME COURT OF THE STATE OF DELAWARE

### CERTIFICATE OF GOOD STANDING

The Clerk of the Supreme Court of the State of Delaware, the highest Court in the State, certifies that **Jay W. Eisenhofer** was admitted to practice as an attorney in the Courts of this State on **December 13, 1990**, and is an *active* member of the Bar of the Supreme Court of the State of Delaware in good standing.

### IN TESTIMONY WHEREOF,

I have hereunto set my hand and affixed the seal of said Court at Dover this 31st day of October 2013.



---

Cathy L. Howard  
Clerk of the Supreme Court

