

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

United States of America, Plaintiff, Ex rel.,)	
Lynn E. Szymoniak, Plaintiff-Relator,)	Case No. 0:10-cv-01465-JFA
)	
v.)	
American Home Mortgage Servicing, Inc. et al.,)	Motion
Defendants.)	in Support of
)	Pro Hac Vice Application
)	

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that James J. Sabella 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
jsabella@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
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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. James J. Sabella

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

(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: jsabella@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.¹

(5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of 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.

Court	Date Admitted	Good Standing	
State of Delaware,	9/17/2008	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S.D.C., S.D. of New York,	3/1/1977	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
U.S.D.C., E.D. of New York,	3/21/1977; see attached for other courts	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

¹This District 1 maintains a web site (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]


I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

- (14) Application Fee. I affirm that the application fee of two hundred and fifty dollars (\$250) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.

- (15) Electronic Notification. By submitting this application, I consent to electronic notification.

- (16) Represented Party/Parties. I seek to represent the following party/parties:
Plaintiff-Relator Lynn E. Szymoniak



Signature of Applicant

Sworn to and subscribed before me
this 17th day of October, 2013.

Catherine Ercole
A Notary Public
of the State of New York

My Commission expires: 11-23-13

CATHERINE ERCOLE
Notary Public, State of New York
No. 01ER6214008
Qualified in New York County
Commission Expires November 23, 2013

Additional Courts in which James J. Sabella is admitted:

U.S. District Court for the Eastern District of Michigan	09/19/1985
U.S. District Court for the Northern District of New York	02/28/2005
U.S. Court of Appeals for the 2d Circuit	04/27/1984
U.S. Court of Appeals for the 9 th Circuit	01/06/2004
U.S. Court of Appeals for the 6 th Circuit	02/08/2008

Appellate Division of the Supreme Court
of the State of New York
First Judicial Department

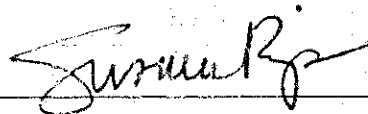
I, Susanna Rojas, Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

JAMES JOSEPH SABELLA

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on **January 31, 1977**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of this court on

October 16, 2013



Clerk of the Court