

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO. 16-CV-62603-WPD

GRISEL ALONSO, AS RECEIVER FOR)
ELM TREE INVESTMENT ADVISORS,)
LLC, ELM TREE INVESTMENT FUND,)
LP, ELM TREE 'E'CONOMY FUND, LP,)
and ELM TREE MOTION)
OPPORTUNITY, LP,)
)
Plaintiff,)
)
vs.)
)
JAMES BENVENUTO, ET AL.)
)
Defendants.)
)

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission pro hac vice of Deborah J. Chadsey, Esq. of the law firm of Kavinoky Cook LLP; 726 Exchange Street, Suite 800 Buffalo, New York 14210; (716) 845-6000, for purposes of appearance as co-counsel on behalf of Defendants, CONSTANTINO DOS SANTOS and EDUARDO DOS SANTOS in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Deborah J. Chadsey, Esq. to receive electronic filings in this case, and in support thereof states as follows:

1. Deborah J. Chadsey, Esq. is not admitted to practice in the Southern District of Florida. She is a member in good standing of The New York Bar; The Pennsylvania Bar; the United States District Court for the Western District of New York; the United States District Court for the Northern District of New York; and the United States District Court for the Eastern District of New York.

2. Movant, Elizabeth Lee Beck, Esq., of the law firm of Beck & Lee Trial Lawyers; 12485 SW 137th Avenue, Suite 205 Miami, Florida 33186; (305) 234-2060, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Deborah J. Chadsey, Esq. has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Deborah J. Chadsey, Esq., by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Deborah J. Chadsey, Esq. at email address: dchadsey@kavinokycook.com.

WHEREFORE, Elizabeth Lee Beck, Esq. moves this Court to enter an Order permitting Deborah J. Chadsey, Esq. to appear before this Court on behalf of Defendants, CONSTANTINO DOS SANTOS and EDUARDO DOS SANTOS, for all purposes relating to the proceedings in

the above-styled matter and directing the Clerk to provide notice of electronic filings to Deborah J. Chadsey, Esq.

DATED: February 7, 2017

RESPECTFULLY SUBMITTED,

/s/ Elizabeth Lee Beck

By: Elizabeth Lee Beck

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(Counsel)

***Attorneys for Defendants
Constantino Dos Santos and
Eduardo Dos Santos***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Appear Pro Hac Vice, Consent to Designation and Request to Electronically Receive Notices of Electronic Filings was served by CM/ECF on February 7, 2017 on all counsel or parties of record on the service list.

/s/ Elizabeth Lee Beck
Elizabeth Lee Beck

SERVICE LIST

Alonso v. Benvenuto, et al.

CASE NO. 16-CV-62603-WPD

United States District Court, Southern District of Florida

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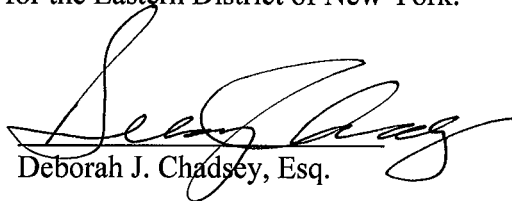
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OPPORTUNITY, LP,)
)
Plaintiff,)
)
vs.)
)
JAMES BENVENUTO, ET AL.)
)
Defendants.)
)

CERTIFICATION OF DEBORAH J. CHADSEY, ESQ.

Deborah J. Chadsey, Esq., pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of The New York Bar; The Pennsylvania Bar; the United States District Court for the Western District of New York; the United States District Court for the Northern District of New York; the United States District Court for the Eastern District of New York.


Deborah J. Chadsey, Esq.

UNITED STATES DISTRICT COURT
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Plaintiff,)
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Defendants.)
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**ORDER GRANTING MOTION TO APPEAR
PRO HAC VICE, CONSENT TO DESIGNATION AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

THIS CAUSE having come before the Court on the Motion to Appear Pro Hac Vice for Deborah J. Chadsey, Esq., Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Deborah J. Chadsey, Esq., may appear and participate in this action on behalf of Defendants, CONSTANTINO DOS SANTOS and EDUARDO DOS

SANTOS. The Clerk shall provide electronic notification of all electronic filings to Deborah J. Chadsey, Esq., at dchadsey@kavinokycook.com.

DONE AND ORDERED in Chambers at _____, Florida,
this _____ day of _____.

United States District Judge

Copies furnished to: All Counsel of Record