

IN THE CIRCUIT COURT OF THE 17th
JUDICIAL CIRCUIT IN AND FOR BROWARD
COUNTY, FLORIDA

CASE No: 12-34121 (07)
Complex Litigation Unit

MARGARET J. SMITH as Managing
General Partner of P&S ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership, and S&P ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership; P&S ASSOCIATES,
GENERAL PARTNERSHIP, a Florida
limited partnership; and S&P ASSOCIATES
GENERAL PARTNERSHIP, a Florida
limited partnership,

Plaintiffs,

vs.

JANET A. HOOKER CHARITABLE
TRUST, a charitable trust, DIANE M. DEN
BLEYKER, an individual, ETTOH LTD., a
Florida limited partnership, JOHN AND/OR
LOIS COMBS, an individual, ERSICA P.
GIANNA, Trustee, CATHERINE B. &
BERRY C. SMITH, individuals, EDNA A.
PROFE REV. LIV. TRUST, HERBERT
IRWIG REVOCABLE TRUST,
HAMPTON FINANCIAL GROUP, INC., a
Florida corporation, EDITH ROSEN, an
individual, RICHARD F. AND BETTE
WEST, individuals, GREGG WALLICK, an
individual, JAMES AND VALERIA
BRUCE JUDD, individuals, JULIANNE M.
JONES, an individual, JESSE A. AND
LOIS GOSS, Trustees, LISA RYAN, an
individual, GERTRUDE GORDON, an
individual, SAM ROSEN, an individual,
PARAGON VENTURES, LTD., an
Austrian limited partnership, HOLY
GHOST FATHERS INTERNATIONAL
FUND #2, a Tax-exempt Organization,

SUSAN E. MOLCHAN OR THOMAS A
WHITEMAN, individuals, JANET B.
MOLCHAN TRUST DTD 05/19/94,
ROBERT A UCHIN REV TRUST, HOLY
GHOST FATHERS, COMPASSION
FUND, a Tax-exempt Organization, HOLY
GHOST FATHERS HG-MOMBASA, a
Tax-exempt Organization, HOLY GHOST
FATHERS INTERNATIONAL FUND #1, a
Tax-exempt Organization, HOLY GHOST
FATHERS HG-IRELAND/KENEMA, a
Tax-exempt Organization,
CONGREGATION OF THE HOLY
GHOST – WESTERN PROVIDENCE, a
Tax-exempt Organization, ABRAHAM OR
RITA NEWMAN, individuals, JOHN T.
CROWLEY, AND/OR JONATHAN
CROWLEY, individuals, ALEX E.
MOLCHAN TRUST DTD 05/19/94, and
ANN OR MICHAEL SULLIVAN,
individuals,

Defendants.

VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE*
PURSUANT TO FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510

Comes now Thomas J. Goodwin, Movant herein, and respectfully represents the following:

1. Movant resides in Cortlandt Manor, New York . Movant is not a resident of the State of Florida.
2. Movant is an attorney and a member of the law firm of McCarter & English, LLP., with offices at Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102, Tel (973) 848-5351, Fax (973) 297-3878.
3. Movant has been retained as a member of the above named law firm on or about July 25, 2013 by HOLY GHOST FATHERS, COMPASSION FUND, HOLY GHOST

FATHERS HG-MOMBASA, HOLY GHOST FATHERS INTERNATIONAL FUND #1, HOLY GHOST FATHERS INTERNATIONAL FUND #2, and HOLY GHOST FATHERS HG-IRELAND/KENEMA, to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the following jurisdiction(s):

- State of New Jersey (Bar ID No. 029531982)
- State of New York (ID No. 1798644)
- United States Supreme Court
- United States Court of Appeals, Third Circuit
- United States District Court, District of New Jersey
- United States District Court, Eastern District of New York
- United States District Court, Southern District of New York

5. There are no disciplinary proceedings pending against Movant, except as provided below:

NONE.

6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings, except as provided below:

NONE.

7. Movant has never been subject to any suspension proceedings, except as provided below:

NONE.

8. Movant has never been subject to any disbarment proceedings, except as provided below:

NONE.

9. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

10. Movant is not an inactive member of The Florida Bar.

11. Movant is not now and has never been a member of The Florida Bar

12. Movant is not a suspended member of The Florida Bar.

13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

14. Movant has not been previously disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510, except as provided below:

NONE.

15. Movant has filed motion(s) to appear as counsel in Florida state courts during the past five (5) years in the following matters:

NONE.

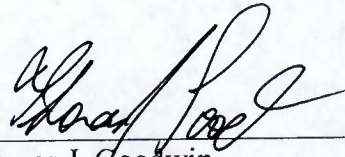
16. Local counsel of record associated with Movant in this matter is Marc S. Dobin, Esq., FBN 997803, who is an active member in good standing of The Florida Bar and has offices at 500 University Boulevard, Suite 205, Jupiter, Florida 33458, (561) 575-5880.

17. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1.310 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

18. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

DATED this 21st day of August, 2013.

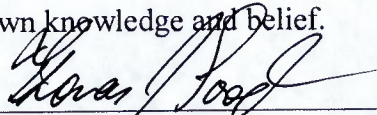


Thomas J. Goodwin
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Newark, New Jersey 07102
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STATE OF NEW JERSEY

COUNTY OF ESSEX

I, Thomas J. Goodwin, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter, that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.



Thomas J. Goodwin

The foregoing instrument was acknowledged before me this 21st day of August, 2013, by Thomas J. Goodwin, who is personally known to me or who has produced _____ as identification and who did take an oath.



Notary Public

Printed or Typed Name **ETHEL S. VIRCIK**
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires 1/24/2017

Commission Number: _____
My commission expires: _____

I hereby consent to be associated as local counsel of record in this cause pursuant to
Florida Rule of Judicial Administration 2.510.

DATED this 21st day of August, 2013.

DOBIN LAW GROUP, PA
500 University Boulevard, Suite 205
Jupiter, Florida 33458
Telephone: (561) 575-5880
Facsimile: (561) 246-3003
Primary E-Mail: service@DobinLaw.com

By: 

Marc S. Dobin
Florida Bar No. 997803

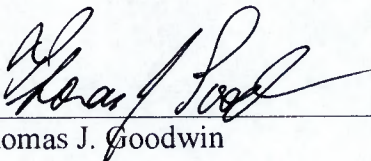
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing motion was furnished by U.S. mail this 21st day of August to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333 accompanied by payment of the \$250.00 filing fee made payable to The Florida Bar and to:

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Thomas J. Goodwin

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