

IN THE CIRCUIT COURT OF THE 17<sup>th</sup>  
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 Joanne M.F. Wilcomes, Movant herein, and respectfully represents the following:

1. Movant resides in North Caldwell, New Jersey. Movant is not a resident of the State of Florida.
2. Movant is an attorney and is associated with the law firm of McCarter & English, LLP, with offices at Four Gateway Center, 100 Mulberry Street, Newark, New Jersey 07102, Tel (973) 848-5318, Fax (973) 297-3928.
3. Movant has been retained as an associate 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. 042981998)
- State of New York (Bar ID No. 3946993)
- United States District Court, District of New Jersey

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.

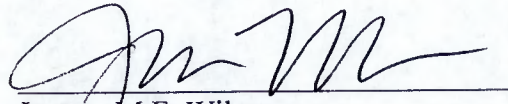
16. Local counsel of record associated with Movant in this matter is Marc S. Dobin, Esq., FBN 997803, who is an active member in good standing of The Florida Bar and has offices at 500 University Boulevard, Suite 205, Jupiter, Florida 33458, (561) 575-5880.

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 21<sup>st</sup> day of August, 2013.

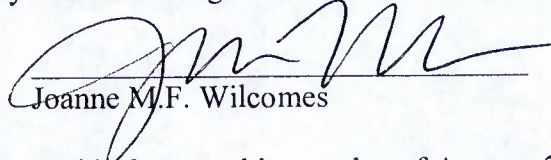


Joanne M.F. Wilcomes  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
Tel (973) 848-5318  
Fax (973) 297-3928.

STATE OF NEW JERSEY

COUNTY OF ESSEX

I, Joanne M.F. Wilcomes, 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.



Joanne M.F. Wilcomes

The foregoing instrument was acknowledged before me this \_\_\_ day of August, 2013, by Joanne M.F. Wilcomes, who is personally known to me or who has produced \_\_\_\_\_ as identification and who did take an oath.

  
Notary Public

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

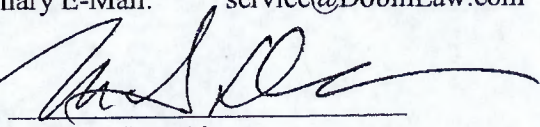
Commission Number: \_\_\_\_\_  
My commission expires: \_\_\_\_\_

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 21<sup>st</sup> 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](mailto: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 21<sup>st</sup> 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:

Thomas M. Messana  
Messana, P.A.  
PO Box 2485  
Fort Lauderdale, FL 33303-2485  
Phone: 954-712-7400  
Fax: 954-712-7401  
E-Mail: [tmessana@messana-law.com](mailto:tmessana@messana-law.com)  
***Counsel for Plaintiff***

Eric N. Assouline  
Assouline & Berlowe, P.A.  
213 E. Sheridan St. Ste 3  
Dania Beach, FL 33004-4607  
Phone: 954-929-1899  
Fax: 954-922-6662  
E-Mail: [ena@assoulineberlowe.com](mailto:ena@assoulineberlowe.com)  
***Counsel for Ersica P. Gianna***

Etan Mark  
Berger Singerman, LLP  
1450 Brickell Ave Ste 1900  
Miami, FL 33131-3453  
Phone: 305-755-9500  
Fax: 305-714-4340  
E-Mail: [emark@bergersingerman.com](mailto:emark@bergersingerman.com)  
***Counsel for Plaintiff***

  
\_\_\_\_\_  
Joanne M.F. Wilcomes