

FILED  
U.S. DIST. COURT  
MIDDLE DIST. OF LA

IN THE UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA 4:14

CASINO CITY, INC.

SIGNATURE  
BY DEPUTY CLERK

NO. 04-557-B-M3

VERSUS

UNITED STATES DEPARTMENT  
OF JUSTICE

**EX PARTE MOTION TO PERMIT NON-RESIDENT  
COUNSEL TO PARTICIPATE IN PROCEEDINGS PRO HAC VICE**

NOW INTO COURT, comes Erick Y. Miyagi, attorney for the defendant, Casino City, Inc., who hereby moves this Honorable Court, pursuant to Rule L.R. 83.2.6M of the Uniform District Court Rules, to allow Barry S. Richard, Laureen E. Galeoto, and Patrick O'Brien to appear and participate as co-counsel for Casino City, Inc., stating as follows:

1.

Mover shows that Barry S. Richard, Laureen E. Galeoto, and Patrick O'Brien are members in good standing of the bar of the State of Florida as noted in the Certificates issued by the State Bar of Florida, attached as Exhibit "A." They practice with the law firm of Greenberg Traurig, P.A., 101 E. College Avenue, P. O. Drawer 1838, Tallahassee, Florida, 32302.

2.

Further, mover attaches the Affidavits of Barry S. Richard, Laureen E. Galeoto, and Patrick O'Brien as Exhibit "B," in which they state under oath that they are licensed to practice under the laws of the State of Florida, that they have been licensed to practice

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law in the State of Florida, and that no disciplinary proceedings or criminal charges have been instituted against them.

3.

Pursuant to LR 83.26M, Mover attaches as Exhibit C Oaths signed by Barry S. Richard, Lauren G. Galeoto, and Patrick O'Brien.

4.

Mover further submits that Casino City, Inc. has associated Frederick R. Tulley, Lloyd J. Lunceford, and Erick Y. Miyagi and their law firm, Taylor, Porter, Brooks & Phillips, LLP, Post Office Box 2471, Baton Rouge, Louisiana 70821, as local counsel in this matter to whom all notices and papers may be served in the above-styled cause and who will be responsible for the progress of the case pursuant to Local Rule 83.2.6M.

5.

Mover requests that Barry S. Richard be designated as Trial Attorney for Casino City, Inc. in this matter.

6.

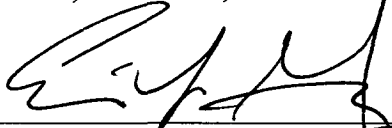
Undersigned attorney hereby certifies that prior to filing this motion he conferred with counsel for defendant and was informed that defendant has no objection to this motion.

**WHEREFORE**, the undersigned requests an order of this Court allowing Barry S. Richard, Lauren E. Galeoto, and Patrick O'Brien to be specially admitted in the above-

referenced action as co-counsel for Casino City, Inc. and that Barry S. Richard be designated as Trial Attorney for Casino City, Inc.

By Attorneys,

TAYLOR, PORTER, BROOKS & PHILLIPS, LLP

By: 

Frederick R. Tulley, #7534

Lloyd J. Lunceford, #8439

Erick Y. Miyagi, #22533

Post Office Box 2471 (70821)

451 Florida Street, 8th Floor

Baton Rouge, Louisiana 70801

Telephone: 225-387-3221

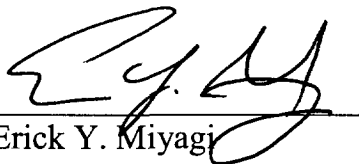
Telecopier: 225-346-8049

*Attorneys for Casino City, Inc.*

**CERTIFICATE**

The undersigned hereby certifies that a copy of the foregoing has been sent by United States Mail, properly addressed and first-class postage prepaid to John J. Gaupp, Assistant United States Attorney, 777 Florida Street, Suite 208, Baton Rouge, LA 70801; and Samuel C. Kaplan, United States Department of Justice, Civil Division, Federal Programs Branch, P. O. Box 883, Washington, D.C. 20044.

Baton Rouge, Louisiana this 19<sup>th</sup> day of November, 2004.

  
Erick Y. Miyagi



# The Florida Bar

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLABAR.ORG

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

State of Florida )

County of Leon )

In Re: 105599  
Barry Scott Richard  
P.O. Box 1838  
Tallahassee, Florida

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

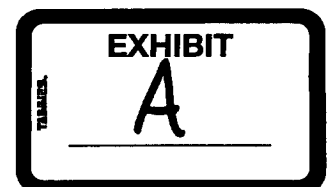
I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on November 10, 1967.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 4<sup>th</sup> day of November, 2004.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/lpw22:R10





# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLABAR.ORG

State of Florida )

County of Leon )

In Re: 194107  
Laureen E. Galeoto  
Greenberg Traurig  
101 E. College Ave.  
Tallahassee, Florida

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on April 10, 2000.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 17<sup>th</sup> day of November, 2004.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/lpw22:R10



# The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLABAR.ORG

State of Florida )

County of Leon )

In Re: 866970  
Patrick T. O'Brien  
Greenberg Traurig, P.A.  
401 E. Las Olas Blvd.  
Suite 2000  
Fort Lauderdale, Florida

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on October 20, 1990.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 10<sup>th</sup> day of November, 2004.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/mlW3:R10

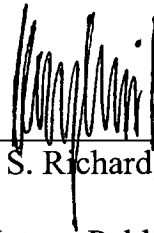
**AFFIDAVIT OF GOOD STANDING**

STATE OF FLORIDA

COUNTY OF LEON

Barry S. Richard, being duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law by the State of Florida and practice with the law firm Greenberg Traurig, P.A., 101 E. College Avenue, P. O. Drawer 1838, Tallahassee, Florida, 32302.
2. I am in good standing with the Florida Bar.
3. I am not, and have never been, the subject of a disciplinary or criminal proceeding.



Barry S. Richard, Bar Roll Number 105599

Sworn to and subscribed before me, Notary Public, this 12 day of November, 2004. *He is personally known to me.*

Christine L. Abbuhl  
Notary Public

My Commission Expires: 7/12/08



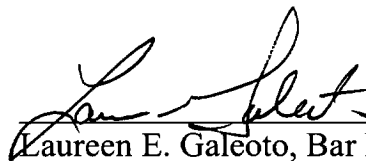
**AFFIDAVIT OF GOOD STANDING**

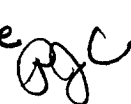
STATE OF FLORIDA

COUNTY OF LEON

Laureen E. Galeoto, being duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law by the State of Florida and practice with the law firm Greenberg Traurig, P.A., 101 E. College Avenue, P. O. Drawer 1838, Tallahassee, Florida, 32302.
2. I am in good standing with the Florida Bar.
3. I am not, and have never been, the subject of a disciplinary or criminal proceeding.

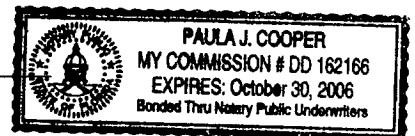
  
Laureen E. Galeoto, Bar Roll Number 194107

Laureen Galeoto is  
- personally  
known to me 

Sworn to and subscribed before me, Notary Public, this 12<sup>th</sup> day of November, 2004.

  
Notary Public

My Commission Expires: Oct. 30, 2006



**AFFIDAVIT OF GOOD STANDING**

STATE OF FLORIDA

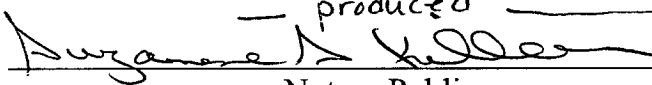
COUNTY OF LEON

Patrick O'Brien, being duly sworn, deposes and says:

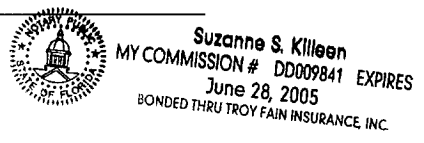
- 4. I am an attorney duly licensed to practice law by the State of Florida and practice with the law firm Greenberg Traurig, P.A., 101 E. College Avenue, P. O. Drawer 1838, Tallahassee, Florida, 32302.
- 5. I am in good standing with the Florida Bar.
- 6. I am not, and have never been, the subject of a disciplinary or criminal proceeding.

  
 \_\_\_\_\_  
 Patrick O'Brien, Bar Roll Number 866970

Sworn to and subscribed before me, Notary Public, this 15 day of November, 2004. Mr. O'Brien is  personally known to me or  produced \_\_\_\_\_ as identification.

  
 \_\_\_\_\_  
 Notary Public

My Commission Expires: \_\_\_\_\_



**IN THE UNITED STATES DISTRICT COURT**

**MIDDLE DISTRICT OF LOUISIANA**

**CASINO CITY, INC.**

**CIVIL ACTION**

**VERSUS**

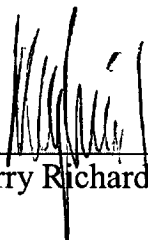
**NO. 04-557-B-M3**

**UNITED STATES DEPARTMENT  
OF JUSTICE**

**OATH**

I do solemnly swear that I will support the Constitution of the United States and that I will demean myself uprightly and according to law and the recognized standards of ethics of the legal profession.

I do further solemnly swear that I have read the Federal Rules of Civil Procedure, 28 USC, the Federal Rules of Criminal Procedure, 18 USC; the Federal Rules of Evidence, 28 USC; and the Uniform Local Rules of the United States District Court for the Middle District of Louisiana, and that I am fully prepared to use and abide by them in my practice before this Court.

  
\_\_\_\_\_  
Barry Richard



**IN THE UNITED STATES DISTRICT COURT**

**MIDDLE DISTRICT OF LOUISIANA**

**CASINO CITY, INC.**

**CIVIL ACTION**

**VERSUS**

**NO. 04-557-B-M3**

**UNITED STATES DEPARTMENT  
OF JUSTICE**

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Lauren E. Galeoto

**IN THE UNITED STATES DISTRICT COURT**

**MIDDLE DISTRICT OF LOUISIANA**

**CASINO CITY, INC.**

**CIVIL ACTION**

**VERSUS**

**NO. 04-557-B-M3**

**UNITED STATES DEPARTMENT  
OF JUSTICE**

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Patrick O'Brien

FILED  
U.S. DIST. COURT  
MIDDLE DIST. OF LA.

IN THE UNITED STATES DISTRICT COURT: 24  
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MIDDLE DISTRICT OF LOUISIANA

SIGN  
by DEPUTY CLERK

CASINO CITY, INC.

CIVIL ACTION

VERSUS

NO. 04-557-B-M3

UNITED STATES DEPARTMENT  
OF JUSTICE

**EX PARTE ORDER**

Considering the foregoing Motion to Permit Non-Resident Counsel to Participate in Proceedings *Pro Hac Vice*:

**IT IS HEREBY ORDERED** that Barry S. Richard, Lauren E. Galeoto, and Patrick O'Brien be and are hereby admitted *pro hac vice* as co-counsel for plaintiff, Casino City, Inc., in the captioned and numbered cause.

**IT IS FURTHER ORDERED** that Barry S. Richard is designated as Trial Attorney for Casino City, Inc. in this matter.

**THUS DONE AND SIGNED** this 22<sup>nd</sup> day of November 2004, at Baton Rouge, Louisiana.

Asia L. Kelly  
m JUDGE, U. S. DISTRICT COURT

Date Docketed  
NOV 23 2004  
Notices Mailed To:

DLG  
JB  
Richard  
Tulley  
Gaupp

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