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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

2005 APR 13 7:13:51

ROBERT JEAN, et al.,

Plaintiffs,

v.

THE STANLEY WORKS, et al.,

Defendants.

CASE NO. 1:04 CV 01904

JUDGE BOYKO

MAGISTRATE JUDGE PERELMAN

MOTION FOR ADMISSION PRO HAC VICE

Defendant American Express Business Finance Corporation, by its counsel, David A. Wallace, Esquire, respectfully moves the Court that co-counsel on this matter, Louis Smith, Esquire, be permitted to appear and participate in this case pro hac vice pursuant to Rule 83.5(h) of the Local Civil Rules for the United States District Court for the Northern District of Ohio. In support of the motion, counsel represents as follows:

1. Mr. Wallace is a member of the Bar of the State of Ohio and of the United States District Court for the Northern District of Ohio.
2. Mr. Smith is a member in good standing of the Bar of the State of New Jersey, having been admitted on December 21, 1993. A Certificate of Good Standing is attached as Exhibit A.
3. Mr. Smith has been retained by defendant American Express Business Finance Corporation to represent its interests in this case.
4. Mr. Smith agrees to comply with the Local Civil Rules for the United States District Court for the Northern District of Ohio, and, pursuant to Local Civil Rule 83.7, also

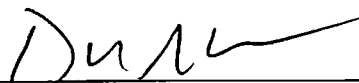
consent to be bound by the Code of Professional Responsibility adopted by the Supreme Court of the State of Ohio.

5. The contact information for Mr. Smith is as follows:

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WHEREFORE, American Express Business Finance Corporation respectfully requests that Louis Smith, Esquire be admitted to appear and participate before this Court pro hac vice to represent defendant American Express Business Finance Corporation in this case.

Respectfully submitted,



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OF COUNSEL

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CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing was served on April 12, 2005 by first class U.S.

Mail, postage pre-paid, upon the following:

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