UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALD P. CZUBA, both individually and on behalf of a class of others similarly situated, Plaintiff, v. IKO MANUFACTURE, INC., Defendants.	Case No. 09-cv-0409 (WMS)

NOTICE OF MOTION FOR
ADMISSION *PRO HAC VICE*

Moving Party:	Plaintiff.
Directed To:	Court.
Date and Time:	To be scheduled by the Court.
Place:	U.S. Courthouse, 68 Court Street, 4th Floor, Buffalo, New York.
Supporting Papers:	Declaration of Charles J. LaDuca in support of motion for admission *pro hac vice* of Charles E. Schaffer, with sworn petition and oath.
Relief Requested:	An order of this Court admitting Charles E. Schaffer, *pro hac vice* for purposes of representing the plaintiff in this action.
Grounds for Relief:	Rule 83.1(i) of the Local Rules of the Western District of New York.
Answering Papers:	If any, are required to be served at least three business days prior to the return date of this motion, in accordance with Local Rule 7.1(c).

Oral Argument: Not requested.

Dated: May 21, 2009

CUNEO GILBERT & LADUCA, LLP

By s/Charles J. LaDuca
Charles J. LaDuca
507 C Street, N.E
Washington, D.C. 20002
Tel: (202) 789-3960
charlesl@cuneolaw.com

Counsel for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

GERALD P. CZUBA, both individually and on behalf of a class of others similarly situated, Plaintiff, v. IKO MANUFACTURE, INC., Defendants.	Case No. 09-cv-0409 (WMS)

DECLARATION OF CHARLES J. LADUCA IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

Charles J. LaDuca, being first duly sworn, deposes and states upon personal knowledge and information as follows:

1. I am a partner with the firm of Cuneo Gilbert & LaDuca, LLP, located at 507 C Street, N.E., Washington, DC 20002.

2. I am counsel for the Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Charles E. Schaffer as counsel pro hac vice to represent the Plaintiff in this matter.

3. I am a member of the New York and District of Columbia Bars. I was initially admitted to the New York Bar in 2001. In addition, I was admitted to practice in this District on August 9, 2005. I am also admitted to practice in the U.S. Court of Appeals for the Third Circuit; U.S. District Courts for the District of Columbia, Northern District of New York, District of Minnesota, and the District of Colorado.

4. Charles E. Schaffer is an attorney at Levin Fishbein Sedran & Berman, located at 510 Walnut Street, Suite 500, Philadelphia, PA 19106. Levin Fishbein Sedran & Berman is co-counsel to plaintiff.

5. I have worked with Mr. Schaffer in the prosecution of this matter and numerous others, and have found him to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to support and respectfully move for the admission of Mr. Schaffer, pro hac vice.

6. I submit a proposed order granting the admission of Mr. Schaffer pro hac vice in this case.

7. The background and bar admission of Mr. Schaffer are set forth in the sworn petition submitted with this motion.

I hereby declare, under penalty of perjury, that the foregoing is true and correct, based on my personal knowledge and information.

By: s/ Charles J. LaDuca

Date: May 21, 2009

Charles J. LaDuca, Bar #3975927
CUNEO GILBERT & LADUCA, LLP
507 C Street, N.E.
Washington, DC 20002
(202) 789-3960

EXHIBITS

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

IN THE MATTER OF THE APPLICATION OF
Charles E. Schaffer
(Name)
TO BE ADMITTED TO PRACTICE AS AN ATTORNEY

PETITION

TO THE HONORABLE JUDGE _____ **OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK:**

Charles E. Schaffer, petitioner herein, respectfully states:

1. That petitioner resides at: 821 Creekview Drive, Blue Bell, PA 19422 and has an office for the practice of law at: Levin Fishbein Sedran & Berman; 510 Walnut Street, Ste. 500, Philadelphia, PA 19106

2. That petitioner attended the following educational institutions and received the following degrees: Villanova University - B.S. Finance Widener - JD

3. Please complete either (a) or (b):
(a) That petitioner was admitted to practice by the Appellate Division of the Supreme Court, _____ Department of the State of New York on the ____ day of _____, _____.
(b) That petitioner was admitted to practice in the United States District Court of the Eastern District of PA on the _____ day of _____, 1997, and is a member of the bar of the State in which that district court is located and in which the petitioner maintains an office for the practice of law, and said District Court by its rules extends a corresponding privilege of admission to members in good standing of the bar of the Western District of New York.

4. Petitioner is admitted to the following courts: PA State Courts, USDC Eastern Dist. of PA, US Courts of Appeals, 3rd Circuit

5. Since such admission(s), petitioner has practiced in the following Courts: PA State Courts, USDC Eastern Dist. of PA
and has been involved in the following professional activities: ATLA, PTLA, Philadelphia Trial Lawyers

6. That Petitioner has never been held in contempt of court, or censured in a disciplinary proceeding, suspended or disbarred by any court or admonished by any disciplinary committee of the organized bar, nor is the subject of any pending complaint before any court: (Note: if petitioner cannot swear to this statement, see Local Rules, which detail the additional statement required of petitioner.)

7. That petitioner has read and is familiar with the provisions of Title 28 of the United States Code which pertain to jurisdiction of and venue in a United States District Court, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, the Local Rules of Practice for the United States District Court for the Western District of New York, the Code of Professional Responsibility as adopted by the Appellate Division of the State of New York and as interpreted and applied by the United States Supreme Court, the United States Court of Appeals for the Second Circuit, and this Court.

WHEREFORE, the petitioner respectfully requests to be admitted as an attorney in the United States District Court for the Western District of New York.

I verify under penalty of perjury that the foregoing is true and correct.

_____
(Signature of Petitioner)

Sworn to before me this 7th day of May, 2009

_____
Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Jacqie Anne Murphy, Notary Public
City of Philadelphia, Philadelphia County
My Commission Expires Jan. 27, 2010
Pennsylvania Association of Notaries

rev. 1999

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

APPENDIX TO CIVILITY PRINCIPLES

OATH OF OFFICE

I do solemnly swear (or affirm):

I will support the Constitution of the United States and the Constitution of the State of New York;

I will maintain the respect due to Courts of Justice and judicial officers;

I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense except such as I believe to be honestly debatable under the law of the land;

I will employ for the purpose of maintaining the causes confided to me such means only as are consistent with truth and honor and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidence and preserve inviolate the secrets of my client and will accept no compensation in connection with his business except from him or with his knowledge and approval;

I will abstain from all offensive personality and advance no fact prejudicial to the honor or reputation of a party or witness unless required by the justice of the cause with which I am charged;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed on members of the bar as conditions for the privilege to practice law in this State and before this Court.

_____

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ATTORNEY'S OATH

STATE OF Pennsylvania)
) SS:
Philadelphia COUNTY)

I, Charles E. Schaffer of Philadelphia, PA
City, State
do solemnly swear or affirm that I will demean myself, as an attorney and counselor of the United States District Court for the Western District of New York, uprightly and accordingly to law; and I will support the Constitution of the United States. So help me God.

Signature of Attorney

Subscribed and sworn to before me this 20th day of May, 2009.

Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Debbie Anne Murphy, Notary Public
City Of Philadelphia, Philadelphia County
My Commission Expires Jan. 27, 2010
Member, Pennsylvania Association of Notaries

Rev. 2/2000

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ORDER GRANTING ADMISSION TO PRACTICE *PRO HAC VICE*

The motion for admission to practice *pro hac vice* in the above-captioned matter is granted. The admitted attorney:

Charles E. Schaffer

is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice *pro hac vice* is required to pay an admission fee and present this Order to the intake deputy in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance in this case, and it will be entered on the Court's docket. A notation of you admission *pro hac vice* for the above-listed case will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Date: _____, 2009

_____

William M. Skretny

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the attached pro hac vice application to be filed electronically on the Court's ECF system.

Date: May 21, 2009

/s/ Charles J. LaDuca
By: Charles J. LaDuca