

IN THE COURT OF COMMON PLEAS
SUMMIT COUNTY, OHIO

ELLORA’S CAVE PUBLISHING, INC.)	Case No. CV-2014-09-4421
<i>et al.</i>)	
Plaintiffs)	
v.)	Judge: GALLAGHER
DEAR AUTHOR MEDIA NETWORK,)	
LLC, <i>et al.</i>)	
Defendants.)	<u>MOTION FOR ADMISSION PRO HAC</u>
)	<u>VICE OF MARC J. RANDAZZA</u>
)	

Defendants Dear Author Media Network, LLC, and Jennifer Gerrish-Lampe (“Dear Author”) by and through their undersigned counsel, Karen C. Lefton, an attorney admitted to the Bar of the State of Ohio and a member in good standing of the Bar of the State of Ohio and of this Court, move this Court for an Order granting Marc J. Randazza, of the Randazza Legal Group of Las Vegas, Nevada, permission to appear as co-counsel for Dear Author in this matter *pro hac vice* and to engage in discovery, trial, and other matters before the Court pertaining to this case. Mr. Randazza’s contact information is:

Marc J. Randazza
Randazza Legal Group
3625 South Town Center Drive
Las Vegas, NV 89135
702-420-2001 – phone
305-437-7662 – fax
mjr@randazza.com

In support of this motion, Dear Author attaches Exhibit A, the Affidavit of Marc J. Randazza pursuant to Gov. Bar R. XII, Section 2 (A)(3); Exhibit B, the list of Courts to which Marc J. Randazza is admitted; and Exhibit C, a Certificate of *Pro Hac Vice* Registration with the Supreme Court of Ohio. Mr. Randazza understands that, if this Motion is granted, he must file a Notice of Permission to Appear *pro hac vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

WHEREFORE, for the foregoing reasons, Dear Author respectfully requests that this Court enter an Order permitting Marc J. Randazza to appear *pro hac vice* in this matter and to allow Mr. Randazza to receive all processes and pleadings.

For the Court's convenience, a proposed Order granting this motion is filed herewith.

Respectfully submitted,

THE LEFTON GROUP

/s/ Karen C. Lefton

Karen C. Lefton (0024522)

755 White Pond Dr., Suite 403

Akron, Ohio 44320

330-864-2003 – phone

330-864-7157 – fax

330-606-8299 – cell

karen@theleftongroup.com

Attorney for Defendant Dear Author Media Network,
LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* was served via the court's electronic case filing system on:

Steve Mastrantonio at mastrantonio@nwm-law.com.

Respectfully submitted,

/s/ Karen C. Lefton

Karen C. Lefton (0024522)

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Marc J. Randazza

AFFIDAVIT OF APPLICANT
Gov. Bar R. XII, Section 2(A)(3)

FOR PRO HAC VICE REGISTRATION

Marc J. Randazza

_____, being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional page if necessary):

Massachusetts

Florida

California

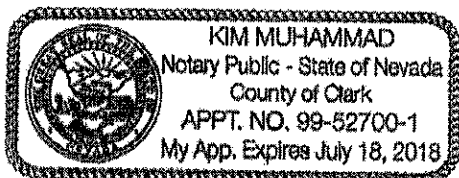
Nevada

- c. Choose one:

- ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- ☐ I am currently suspended from the practice of law in the following jurisdictions:

- d. Choose one:

- ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):



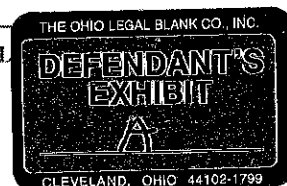
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 1 day of October,
20 14, in the state of Nevada and county of Clark.

SIGNATURE OF NOTARY PUBLIC

*Notary public's stamp/seal
and commission expiration
date are required.

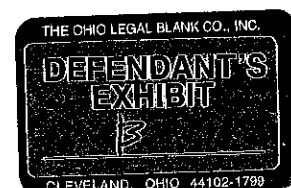
Daniel M. Horrigan, Summit County Clerk of Courts



Marc J. Randazz, Esq.
Courts to Which Admitted

Jurisdiction	Status	Date Admitted	Bar No.
Massachusetts Bar	Active	Jan. 24, 2002	651477
Florida Bar	Active	March 25, 2003	625566
California Bar	Active	May 20, 2010	269535
Arizona Bar	Active	August 26, 2010	027861
Nevada Bar	Active	Jan. 6, 2012	12265
1 st Circuit	Active	May 8, 2003	n/a
6 th Circuit	Active	July 30, 2013	n/a
7 th Circuit	Active	Nov. 26, 2009	n/a
11 th Circuit	Active	June 20, 2003	n/a
9 th Circuit	Active	Sept. 4, 2009	n/a
10 th Circuit	Active	Nov. 3, 2011	n/a
US Dis. Ct. Mass	Active	June 12, 2002	n/a
US Dist. Ct. N.D. Fla.	Active	May 17, 2005	n/a
US Dist. Ct. M.D. Fla.	Active	June 9, 2003	n/a
US Dist. Ct. N.D. Texas	Active	Aug. 4, 2006	n/a
US Dist. Ct. E.D. Cal.	Active	Nov. 12, 2009	n/a
US Dist. Ct. S.D. Cal.	Active	June 8, 2010	n/a
US Dist. Ct. C.D. Cal.	Active	June 8, 2010	n/a
US Dist. Ct. N.D. Cal.	Active	June 33, 2010	n/a
US Dist. Ct. Ariz.	Active	Oct. 19, 2010	n/a
Us Dist. Colo.	Active	March 28, 2011	n/a
US Dist. Ct. E.D. Wisc.	Active	June 18, 2012	n/a
US Dist. Ct. N.D. Ohio	Active	Feb. 13, 2012	n/a
United States Supreme Court	Active	Feb. 28, 2005	n/a
US Dist. Ct. E.D. Mich.	Active	June 30, 2009	n/a
United States District Court for the Federal Circuit	Active	Sept. 1, 2006	n/a

Daniel M. Horrigan, Summit County Clerk of Courts



OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Marc Randazza

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2014

Registration Number:
PHV- 5686-2014

Marc Randazza

, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Susan B. Christoff

Susan B. Christoff
Director, Attorney Services

Expires December 31, 2014

Daniel M. Horrigan, Summit County Clerk of Courts

