FILING FEE
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Steven M. Larimore, Clerk

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STEVEN M. LARIMORE
CLERK U. S. DIST. CT.
S. D. of FLA. – MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(Miami Division)

CASE NO. 10-CV-24597-AJ

NAKED, LLC,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC.,

Defendant.
_____/

MOTION TO APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION, AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING

In accordance with Local Rules 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Baldassare Vinti, Esquire, of the law firm of Proskauer Rose LLP, with offices at 11 Times Square, New York, NY 10036, (212) 969-3000, for purposes of appearance as co-counsel on behalf of the Defendant Church & Dwight Co., Inc., in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Baldassare Vinti, Esquire to receive electronic filings in this case, and in support thereof states as follows:

1. Baldassare Vinti, Esquire is not admitted to practice in the Southern District of Florida and is a member in good standing and eligible to practice law in the States of New York and New Jersey[1] and is admitted in the following jurisdictions:

a. State of New Jersey;

[1] Mr. Vinti is in good standing in New Jersey, but appears *pro hac vice* in New Jersey because he does not maintain an office in New Jersey and does not fulfill New Jersey CLE requirements.

b. United States District Court, New York, Southern District;

c. United States District Court, New York, Eastern District;

d. United States Court of Appeals for the Federal Circuit

2. Movant, Andrew Hoffman, Esquire, of the law firm of Proskauer Rose LLP, 2255 Glades Road, Suite 421 Atrium, Boca Raton, Florida 33431, Telephone (561) 241-7400, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Baldassare Vinti, Esquire has made payment of this Court's $75 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Baldassare Vinti, Esquire, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Baldassare Vinti, Esquire at email address: bvinti@proskauer.com.

5. Pursuant to Local Rule 7.1(A)(3), Counsel for Defendant has conferred with Counsel for Plaintiff and is authorized to represent that counsel for Plaintiff has no objection to the requested relief.

WHEREFORE, Andrew Hoffman, Esquire, moves this Court to enter an Order permitting Baldassare Vinti, Esquire, to appear before this Court on behalf of the Defendant Church & Dwight Co., Inc., for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Baldassare Vinti, Esquire.

DATED the 27th day of April, 2011.

PROSKAUER ROSE LLP
Counsel for Defendant Church & Dwight Co., Inc.
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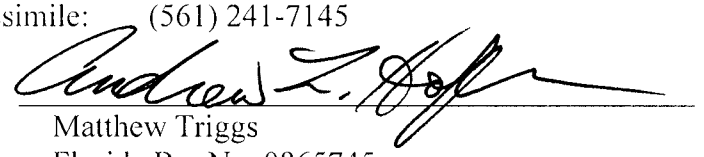
By: 

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
(Miami Division)

CASE NO. 10-CV-24597-AJ

NAKED, LLC,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC.,

Defendant.
_____/

CERTIFICATION OF BALDASSARE VINTI

Baldassare Vinti, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of the Bars in the States of New York and New Jersey[2], and am admitted to practice in the following jurisdictions:

a. United States District Court for the Southern District of New York;

b. United States District Court for the Eastern District of New York; and

c. United States Court of Appeals for the Federal Circuit.

Baldassare Vinti
BALDASSARE VINTI

[2] [2] I am in good standing in New Jersey, but appear *pro hac vice* in New Jersey because I do not maintain an office in New Jersey and do not fulfill New Jersey CLE requirements.

Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department

I, **Matthew G. Kiernan**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Baldassare Vinti** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **22 nd** day of **March 2000**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on April 20, 2011.

Matthew G. Kiernan

Clerk of the Court

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished U.S. Mail to the addressees set forth on the attached Service List this 27th day of April, 2011.

Andrew Hoffman

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
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CASE NO. 10-CV-24597-AJ

NAKED, LLC,

Plaintiff,

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ORDER GRANTING MOTION TO APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING

THIS CAUSE having come before the Court on the Motion to Appear *Pro Hac Vice* for Baldassare Vinti, Esquire, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Baldassare Vinti, Esquire, of Proskauer Rose LLP, with offices at 11 Times Square, New York, NY 10036, (212) 969-3000, may appear and participate in this action on behalf of the Defendant Church & Dwight Co., Inc. The Clerk shall provide electronic notification of all electronic filings to Baldassare Vinti, Esquire, at bvinti@proskauer.com.

DONE AND ORDERED in Chambers at Miami, Florida, this _____ day of April, 2011.

ADALBERTO JORDAN
United States District Judge

COPIES FURNISHED:
See attached Service List

Service List
Case No. 10-CV-24597-AJ
United States District Court, Southern District of Florida

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James H. Shalek, Esq. (*Pro Hac Vice* papers to be filed)
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