

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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JOSEPH RAKOFSKY and RAKOFSKY LAW FIRM, P.C.,

Plaintiffs,

-against-

THE WASHINGTON POST COMPANY, et al.,

Defendants.

VERIFIED PETITION FOR
ADMISSION
PRO HAC VICE

Index # 105573/11

-----X
Marc J. Randazza, being duly sworn, deposes and says:

I am an attorney admitted to practice in Arizona, California, Florida and Massachusetts. I am counsel to 30 of the defendants named in this action. I make this verified petition, in compliance with 22 NYCRR §§ 520.11(a)(1) and 602.2(a), based upon personal knowledge.

1. I am the managing partner of Randazza Legal Group and have been admitted to practice law since January, 2002.
2. The primary focus of my practice is on First Amendment issues, with an emphasis on their application in copyright, trademark, trade secret and other intellectual property disputes.
3. I have been retained to represent the individuals and entities listed below, all of which are defendants in this action.

Writer/Defendant	Associated Entities	Amended Complaint ¶¶	Jurisdiction, as per Amended Complaint	Total Defendants
Eric Turkewitz	The Turkewitz Law Firm	47-48; 172	Washington, DC	2
Scott Greenfield	Simple Justice NY, LLC blog.simplejustice.us Kravet & Vogel, LLP	19-21; 148-152; 212	New York	4
Carolyn Elephant	MyShingle.com	16-17; 146-	Washington,	2

		147; 201	DC	
Mark Bennett	Bennett And Bennett	32-33; 160; 206	Texas	2
Eric L. Mayer	Eric L. Mayer, Attorney-at-Law	22-23; 153; 203	Kansas	2
Nathaniel Burney	The Burney Law Firm, LLC	82-83;193- 194; 198	New York	2
Josh King	Avvo, Inc.	78-79; 202	Washington State	2
Jeff Gamso		24-25; 154	Ohio	1
George M. Wallace	Wallace, Brown & Schwartz	57-58; 180- 181	Florida	2
"Tarrant84"	Banned Ventures Banni	65-67; 185	Colorado	3
Brian L. Tannebaum	Tannebaum Weiss	55-56; 179	Florida	2
Colin Samuels	Accela, Inc.	80-81; 192; 199	California	2
Crime and Federalism	John Doe #1	26-27; 155- 157	Unknown	2
Antonin I. Pribetic	Steinberg Morton	51-52; 175; 205	Canada	2
14 Individuals				30 entities

4. I am duly licensed as an attorney, and in good standing, in the states of Arizona, California, Florida and Massachusetts. Certificates of Good Standing from the relevant authorities within each of these states have been ordered and will be filed with the Court once received.

5. Currently, I am awaiting admission to the State Bar in Nevada, and have successfully completed the Nevada bar examination.

6. I am not, nor have I ever been, subject to any ethical charge or grievance by or before the state bars, supreme courts, or other appropriate adjudicative bodies within the states of Arizona, California, Florida or Massachusetts.

7. I have not previously been admitted to practice *pro hac vice* in this or any other court within New York.

8. I possess the good moral character necessary to practice law in New York State.

9. I have reviewed, am familiar with, and shall comply with the standards of professional conduct applicable to members of the New York State bar. This includes the Rules of Court governing the conduct of attorneys, as well as the Rules of Professional Conduct, promulgated as joint rules of the Appellate Divisions of the Supreme Court of New York.

10. In this matter, I have designated Eric Turkewitz as New York local counsel.

11. I consent to the jurisdiction of New York's courts for all issues arising from this representation.

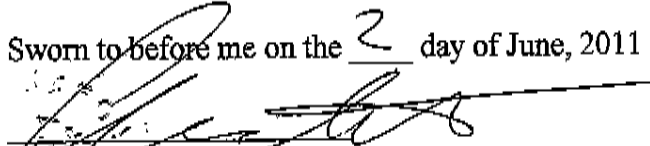
Dated: June 3, 2011



Marc J. Randazza, as counsel
to the named individuals and entities
listed above

Dated: June 2, 2011

Sworn to before me on the 2 day of June, 2011

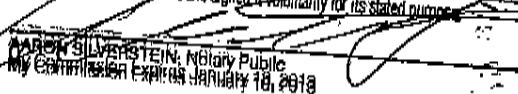


NOTARY PUBLIC



AARON SILVERSTEIN
Notary Public
Commonwealth of Massachusetts
My Commission Expires
January 18, 2013

The Commonwealth of Massachusetts
On this 2 day of June, 2011
before me, the undersigned notary public, personally appeared
Marc J. Randazza
proved to me through satisfactory evidence of identification, which were ID's
and the person whose name is signed on the preceding or attached document and
acknowledged to me that he/she signed it voluntarily for its stated purpose.



AARON SILVERSTEIN, Notary Public
My Commission Expires January 18, 2013