Case 0:14-cr-60026-JIC Document 61 Entered on FLSD Docket 02/26/2014

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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO.: 14-60026-CR-ROSENBAUM

FILED by PG D.C.

FEB 2 5 2014

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

	X
UNITED STATES OF AMERICA	
	Plaintiffs,
vs.	
SRDJAN JOVCIC	
	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 Simone Bertollini, Esquire of the law firm of Bertollini & O'Reilly, LLC, 325 Broadway, Suite 401, New York, NY 10007, telephone (212) 566-3572, facsimile (917) 512-4400 for purposes of appearance as co-counsel on behalf of Defendant, Srdjan Jovcic in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Simone Bertollini, Esquire to receive electronic filings in this case, and in support thereof states as follows:

1. Simone Bertollini, Esquire is not admitted to practice in the Southern District of Florida and is a member in good standing of the New Jersey State Bar, New York State Bar, U.S. District Court, District of New Jersey, U.S. District Court, Southern District of

New York, U.S. Court of Appeals for the Third Circuit, and U.S. Court of Appeals for the Second Circuit.

- 2. Movant, Paul D. Petruzzi, Esquire, of the law firm of the Law Offices of Paul D. Petruzzi, 169 E. Flagler Street, Suite 1241, Miami, FL 33131, telephone (305) 373-6773 and facsimile (305) 373-3832 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, Simone Bertollini, Esquire has made payment of this Court's \$75 admission fee.
- 4. Simone Bertollini, 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 Simone Bertollini, Esquire at email address: simone@bertollini-oreilly.com.

WHEREFORE, Paul D. Petruzzi, Esquire moves this Court to enter an Order allowing Simone Bertollini, Esquire to appear before this Court on behalf of Srdjan Jovcic for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Simone Bertollini, Esquire.

Respectfully submitted,

PAUL D. PETRUZZI, ESQ. Elorida Bar Number 982059 petruzzi-law@msn.com Law Offices of Paul D. Petruzzi Alfred I. Dupont Building 169 E. Flagler Street, Suite 1241

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