Name and address:

Richard W. Epstein (Fla. Bar No. 229091)
Greenspoon Marder, P.A.
200 E. Broward Blvd., Suite 1800
Ft. Lauderdale, FL 33301

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission Plaintiff(s), v. M&T Financial Group, American Counseling Center Corp. and Salar Tahour Defendant(s),	CASE NUMBER CV17-6855 OWD (PLAx) **APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE *PRO HAC VICE***

INSTRUCTIONS FOR APPLICANTS

(1) *The attorney seeking to appear pro hac vice must complete Section I of this Application, personally sign, in ink, the certification in Section II, and have the designated Local Counsel sign in Section III.* ***ELECTRONIC SIGNATURES ARE NOT ACCEPTED.*** *Space to supplement responses is provided in Section IV. The applicant must also attach a Certificate of Good Standing (issued within the last 30 days) from every state bar to which he or she is admitted; failure to do so will be grounds for denying the Application. Scan the completed Application with its original ink signature, together with any attachment(s), to a single Portable Document Format (PDF) file.*

(2) *Have the designated Local Counsel file the Application electronically (using the Court's CM/ECF System), attach a Proposed Order (using Form G-64 ORDER, available from the Court's website), and pay the required $325 fee online at the time of filing (using a credit card). The fee is required for each case in which the applicant files an Application. Failure to pay the fee at the time of filing will be grounds for denying the Application.* ***Out-of-state federal government attorneys are not required to pay the $325 fee.*** *(Certain attorneys for the United States are also exempt from the requirement of applying for pro hac vice status. See L.R. 83-2.1.4.) A copy of the G-64 ORDER in Word or WordPerfect format must be emailed to the generic chambers email address. L.R. 5-4.4.2.*

SECTION I - INFORMATION

Epstein, Richard W.
Applicant's Name (Last Name, First Name & Middle Initial) *check here if federal government attorney* ☐

Greenspoon Marder, P.A.
Firm/Agency Name

200 E. Broward Blvd., Suite 1800
Street Address

(954)491-1120
Telephone Number

(954)771-9264
Fax Number

Ft. Lauderdale, FL 33301
City, State, Zip Code

richard.epstein@gmlaw.com
E-mail Address

I have been retained to represent the following parties:

M&T Financial Group, et al. ☐ *Plaintiff(s)* ☒ *Defendant(s)* ☐ *Other:*

American Counseling Center Corp. et al. and Salar Tahour ☐ *Plaintiff(s)* ☒ *Defendant(s)* ☐ *Other:*

Name(s) of Party(ies) Represented

List all state and federal courts (including appellate courts) to which the applicant has been admitted, and provide the current status of his or her membership. Use Section IV if more room is needed, or to provide additional information.

Name of Court	*Date of Admission*	*Active Member in Good Standing? (if not, please explain)*
See Attached		

List all cases in which the applicant has applied to this Court for *pro hac vice* status in the previous three years (continue in Section IV if needed):

Case Number	*Title of Action*	*Date of Application*	*Granted / Denied?*
2:15-cv-00828	Scott Wiederhold v. Consolidated World Travel	4/27/15	5/12/15
2:15-cv-02655	John Woods et al v. Express Scripts	10/23/15	10/26/15
8:15-cv-01945	Paul Sapan v. Celebration Cruise Line, LLC	1/13/16	1/14/16
2:16-cv-04184	Jean D. Nubla v. Central Florida Investment	6/24/16	6/27/16
5:16-cv-00339	Quinshawnda Smith v. Altima Medical Equipment	4/5/16	4/12/16

If any *pro hac vice* applications submitted within the past three (3) years have been denied by the Court, please explain:

N/A

Has the applicant previously registered as a CM/ECF user in the Central District of California? ☒ Yes ☐ No

If yes, was the applicant's CM/ECF User account associated with the e-mail address provided above? ☒ Yes ☐ No

Previous E-mail Used (if applicable)

Attorneys must be registered for the Court's Case Management/Electronic Case Filing ("CM/ECF") System to be admitted to practice pro hac vice in this Court. Submission of this Application will constitute your registration (or re-registration) as a CM/ECF User. If the Court signs an Order granting your Application, you will either be issued a new CM/ECF login and password, or the existing account you identified above will be associated with your case. Pursuant to Local Rule 5-3.2.3, registering as a CM/ECF User is deemed consent, for purposes of Fed. R. Civ. P. 5(b)(2)(E), to electronic service of documents through the CM/ECF System. You have the right to withhold or revoke your consent to electronic service at any time; simply complete and return a Central District Electronic Service Exemption Form (Form G-05, available from the Court's website). If the Court receives an Electronic Service Exemption Form from you, you will no longer receive notice by e-mail when Court orders or other documents are filed in cases in which you are counsel of record; instead, copies of such documents will be sent to you through the mail.

SECTION II - CERTIFICATION

I declare under penalty of perjury that:

(1) All of the above information is true and correct.

(2) I am not a resident of the State of California. I am not regularly employed in, or engaged in substantial business, professional, or other activities in the State of California.

(3) I am not currently suspended from and have never been disbarred from practice in any court.

(4) I am familiar with the Court's Local Civil and Criminal Rules, the Federal Rules of Civil and Criminal Procedure, and the Federal Rules of Evidence.

(5) I designate the attorney listed in Section III below, who is a member in good standing of the Bar of this Court and maintains an office in the Central District of California for the practice of law, as local counsel pursuant to Local Rule 83-2.1.3.4.

Dated 9.28.17

Richard W. Epstein

Applicant's Name (please type or print)

Applicant's Signature

SECTION III - DESIGNATION OF LOCAL COUNSEL

Lalezari, Babak

Designee's Name (Last Name, First Name & Middle Initial)

Redefine Law Firm, Inc.

Firm/Agency Name

4311 Wilshire Blvd., Suite 205

Street Address

Los Angeles, CA 90010

City, State, Zip Code

(310)571-5297

Telephone Number

(310)684-5793

Fax Number

blalezari@redefinelawfirm.com

E-mail Address

261703

Designee's California State Bar Number

I hereby consent to the foregoing designation as local counsel, and declare under penalty of perjury that I maintain an office in the Central District of California for the practice of law.

Dated 10/2/17

Babak Lalezari

Designee's Name (please type or print)

Designee's Signature

SECTION IV - SUPPLEMENT ANSWERS HERE (ATTACH ADDITIONAL PAGES IF NECESSARY)

8:16-cv-01032 Rosario J. San Antonio v. Central Florida Investment 6/3/16 6/6/16

RICHARD W. EPSTEIN

ADMISSIONS TO COURTS

Florida	May 31, 1977	Bar # 229091
US District Court and Bankruptcy Court for the Southern District of Florida	April 7, 1978	Bar # 229091
US District Court and Bankruptcy Court for the Middle District of Florida	1979	Bar # 229091
Eleventh Circuit US Court of Appeal	September 5, 1991	Bar # N/A
First Circuit US Court of Appeal	September 16, 2009	Bar # N/A
Ninth Circuit US Court of Appeal	April 2010	Bar # N/A
Supreme Court of the United States	January 22, 2008	Bar # N/A
Sixth Circuit US Court of Appeal	February 2011	Bar # N/A
Fourth Circuit US Court of Appeal	August 8, 2011	Bar # N/A
Third Circuit US Court of Appeal	January 17, 2012	Bar # N/A
Second Circuit US Court of Appeal	April 11, 2013	Bar # N/A
US Court of Appeal District of Columbia	June 17, 2013	Bar # N/A
U.S. District Court, District of Montana	April 10, 2017	
U.S. District Court, Eastern District of Michigan	Augsut 16, 2016	
U.S. District Court, Western District of Michigan	August 21, 2012	
U.S. District Court, Northern District New York	October 15, 2013	Bar # 107200
U.S. District Court, District of Arizona	November 27, 2013	Bar # N/A
U.S. District Court, Southern District California	December 5, 2013	Bar # N/A
U.S. District Court, District of Colorado	November 25, 2014	Bar # N/A

The Florida Bar

651 East Jefferson Street
Tallahassee, FL 32399-2300

John F. Harkness, Jr.
Executive Director

Joshua E. Doyle
Executive Director Designate

State of Florida)

County of Leon)

In Re: 229091
Richard Wayne Epstein
Greenspoon Marder, P.A.
200 E. Broward Blvd., Ste. 1800
Fort Lauderdale, FL 33301-1949

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on May 31, 1977.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is an active member of The Florida Bar in good standing.

Dated this 25th day of September, 2017.

Pam Gerard, Manager
Membership Records Dept.
The Florida Bar

PG/BF:ksw2:R10

PROOF OF SERVICE

I, **Babak Lalezari**, declare as follows:

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and am not a party to this action; my business address is 4311 Wilshire Blvd., Suite #205, Los Angeles, California 90010, in said County and State. On October 2, 2017, I served the parties with:

APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE PRO HAC VICE; PROPOSED ORDER

by the following means of service:

☑ **BY CM/ECF Electronic Service:** I caused such document to be served via the Court's (NEF) electronic filing system on all registered parties.

☐ **BY UNITED STATES MAIL:** I placed a true copy in a sealed envelope or package addressed to the persons as indicated above, on the above-mentioned date, and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited with the U.S. Postal Service in the ordinary course of business in a sealed envelope with postage fully prepaid. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing set forth in this declaration.

I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.
I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 2, 2017 in Los Angeles, California.

/s/ Babak Lalezari
Babak Lalezari