

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

BRUCE AND WENDY ANDERSON,

Plaintiffs,

v.

AMWAY/QUIXTAR, INC.,  
MICHAEL YOUNG MCCORMICK,  
DONALD E. CHRISTOPHER, AND  
HAL GOOCH,

Defendants.

CASE NO. 3:07-cv-00844-HLA-JRK

**MOTION TO PROCEED PRO HAC VICE**

Defendant, Quixtar Inc. (“Quixtar”) by and through its undersigned counsel, and pursuant to Local Rule 2.02, hereby files this Motion to Proceed Pro Hac Vice and states as follows:

1. This Motion to Proceed Pro Hac Vice is filed on behalf of Timothy Q. Delaney for permission to appear on behalf of Defendant.

2. Timothy Q. Delaney is an attorney with the law firm of Brinks Hofer Gilson & Lione, 455 N. Cityfront Plaza Drive, Chicago, Illinois 60611, telephone (312) 321-4200 and facsimile number is (312) 321-4299.

3. Timothy Q. Delaney is admitted in good standing to the Bar of the State of Illinois and to the Courts shown on the attached Exhibit A.

4. Timothy Q. Delaney is not a resident of the State of Florida, nor does he maintain a regular practice of law within this State.

5. As set forth in his Special Admission Attorney Certification, Timothy Q. Delaney has read and is familiar with the most recent version of the Local Rules of this Court. He is also familiar with and understands he will be bound by the Local Rules of this Court, including in

particular Fla. Local Rule 2.04, as well as by the Code of Professional Responsibility and other professional and ethical limitations as set forth by The Florida Bar.

6. Timothy Q. Delaney's Special Admission Attorney Certification, along with the \$10 fee payable to Clerk, U.S. District Court, are being contemporaneously sent to the Clerk.

7. Timothy Q. Delaney will complete the ECF Attorney Registration Form online on the Court's website promptly upon entry of an order granting this Motion.

8. Pursuant to Local Rule 2.02(a), this Motion to Proceed Pro Hac Vice shall also serve as the written designation and consent-to-act for local counsel admitted to this Court and resident in Florida, as designated hereafter: Sarah G. Maroon, Akerman Senterfitt, 50 North Laura Street, Suite 2500, Jacksonville, Florida 32202, telephone (904) 798-3700 and facsimile (904) 798-3730.

#### **LOCAL RULE 3.01(g) CERTIFICATION**

Pursuant to M.D. Fla. Loc. R. 3.01(g), the undersigned certifies that she has consulted with counsel for Plaintiffs and has been informed that Plaintiffs object to this Motion.

WHEREFORE, Defendant, Quixtar Inc. respectfully requests that Timothy Q. Delaney be specially admitted to practice in the above-named court for this cause only.

DATED: January 29, 2008.

Respectfully submitted,

/s Sarah G. Maroon

Sarah G. Maroon

Florida Bar Number 181757

email: sarah.maroon@akerman.com

**AKERMAN SENTERFITT**

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Jacksonville, Florida 32202

Telephone: (904) 798-3700

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and

Timothy Q. Delaney

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Jon H. Beaupre

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**BRINKS HOFER GILSON & LIONE**

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Telephone: (312) 321-4200

Facsimile: (312) 321-4299

**ATTORNEYS FOR DEFENDANT,  
QUIXTAR INC.**

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 29th day of January, 2008, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send notification of such filing to the following:

Donald E. Christopher

Email: dchristopher@litchfordchristopher.com

Keith E. Rounsaville

Email: krounsaville@litchfordchristopher.com

LITCHFORD & CHRISTOPHER

Professional Association

Bank of America Center

390 North Orange Avenue

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Gerald F. Richman  
Email: grichman@richmangreer.com  
Leora Beth Freire  
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Richman Greer  
Suite 1504, 250 Australian Ave. South  
West Palm Beach, FL 33401

I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the following non-CM/ECF participants on January 29, 2008:

Bruce and Wendy Anderson  
11211 Portside Drive  
Jacksonville, FL 32225-1516

William E. West, Jr.  
3000 Bethesda Place, Suite 703  
Winston-Salem, North Carolina 27103

Michael Y. McCormick  
1900 West Loop South, Suite 700  
Houston, Texas 77027

/s Sarah G. Maroon  
Attorney

**EXHIBIT A**

**STATE AND FEDERAL COURT ADMISSIONS OF TIMOTHY Q. DELANEY**

**Timothy Q. Delaney is active and a member  
in good standing in the following jurisdictions**

<b><u>Court</u></b>	<b><u>Date Admitted</u></b>
State of Illinois (Registration No. 6198816)	1988
U.S. District Court for the Northern District of Illinois	01/11/1989
U.S. Court of Appeals for the Federal Circuit	03/04/1991
U.S. District Court for the Western District of Michigan	06/04/1992
Northern District of Illinois Trial Bar	07/28/1994
U.S. Court of Appeals for 10 <sup>th</sup> Circuit	04/27/1999
U.S. Court of Appeals for 6 <sup>th</sup> Circuit	10/29/2001