

**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 Jon H. Beaupre for permission to appear on behalf of Defendant.

2. Jon H. Beaupre 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. Jon H. Beaupre is admitted in good standing to the Bar of the State of Michigan and to the Courts shown on the attached Exhibit A.

4. Jon H. Beaupre 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, Jon H. Beaupre 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. Jon H. Beaupre'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. Jon H. Beaupre 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 Jon H. Beaupre 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

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and

Timothy Q. Delaney

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Jon H. Beaupre

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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

Post Office Box 1549

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Gerald F. Richman
Email: grichman@richmangreer.com
Leora Beth Freire
Email: lfreire@richmangreer.com
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 JON H. BEAUPRE

**Jon H. Beaupre is active and a member
in good standing in the following jurisdictions**

<u>Court</u>	<u>Date Admitted</u>
State of Michigan (Registration No. P66389)	2003
U.S. District Court for the Eastern District of Michigan	2004