

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

ANDREA ROSSI and LEONARDO
CORPORATION,

Plaintiffs,

v.

THOMAS DARDEN; JOHN T. VAUGHN,
INDUSTRIAL HEAT, LLC; IPH
INTERNATIONAL B.V.; and
CHEROKEE INVESTMENT PARTNERS,
LLC,

Defendants.

CASE NO. 1:16-cv-21199-CMA

INDUSTRIAL HEAT, LLC and IPH
INTERNATIONAL B.V.,

Counter-Plaintiffs,

v.

ANDREA ROSSI and LEONARDO
CORPORATION,

Counter-Defendants,

and

J.M. PRODUCTS, INC.; HENRY
JOHNSON; FABIO PENON; UNITED
STATES QUANTUM LEAP, LLC;
FULVIO FABIANI; and JAMES A. BASS,

Third-Party Defendants.

**UNOPPOSED MOTION TO
APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION,
AND REQUEST TO
ELECTRONICALLY RECEIVE
NOTICES OF ELECTRONIC
FILING**

**UNOPPOSED MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

Pursuant to Rule 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 Bernard P. Bell of the law firm of Miller Friel, PLLC, 1200 New Hampshire Avenue, NW, Suite 800, Washington, DC 20036, (202) 760-3158, for purposes of appearance as co-counsel on behalf of Defendants Thomas Darden, John T. Vaughn, Industrial Heat, LLC, IPH International B.V., and Cherokee Investment Partners, LLC (“Defendants”), in the above-styled case only, and, pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Bernard P. Bell to receive electronic filings in this case. This motion is unopposed. In support of this motion, the undersigned states:

1. Bernard P. Bell is not admitted to practice in the Southern District of Florida and is a member in good standing of the following bars:

- The State of New York; and
- The District of Columbia.

2. Movant, Christopher R. J. Pace, Esquire, of the law firm of Jones Day, 600 Brickell Avenue, Suite 3300, Miami, FL 33131, (305) 714-9730, is a member in good standing of the Florida Bar and the United States District Court for the Southern District of Florida 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

and serving 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, Bernard P. Bell has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4(b) is attached as Exhibit 1.

4. Bernard P. Bell, 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 Bernard P. Bell at email address: bellb@millerfriel.com.

WHEREFORE, Christopher R.J. Pace moves this Court to enter an Order permitting Bernard P. Bell to appear before this Court on behalf of Defendants for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Bernard P. Bell. For the Court's convenience, a proposed order is attached as Exhibit 2.

Certificate of Compliance with Local Rule 7.1(a)(3)

Pursuant to S.D. Fl. Local Rule 7.1(a)(3), the undersigned certifies that counsel for Defendants has conferred with counsel for all other parties and that the parties do not oppose the relief requested in this motion.

Dated: January 10, 2017

Respectfully submitted,

/s/ Christopher R. J. Pace

Christopher R.J. Pace
cpace@jonesday.com
Florida Bar No. 721166
Christopher M. Lomax
clomax@jonesday.com
Florida Bar No. 56220
Erika S. Handelson
Florida Bar No. 91133
ehandelson@jonesday.com
Christina T. Mastrucci
Florida Bar No. 113013
JONES DAY
600 Brickell Avenue, Suite 3300
Miami, Florida 33131
Tel: 305-714-9700
Fax: 305-714-9799

*Attorneys for Defendants and Counter-
Plaintiffs*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 10, 2017, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record for the parties.

/s/ Erika S. Handelson

Erika S. Handelson