

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
UNITED STATES OF AMERICA,

Plaintiff,

-against-

JAMES BENNETT,

Defendant.  
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TO: Mr. Winston M. Paes, AUSA  
United States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, NY 11201

NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

09-CR-0032

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificates of Good Standing annexed thereto as Exhibit A & Exhibit B, we will move this Court before the Honorable John Gleeson at the United States Courthouse for the Eastern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of The Law Office of Robert D. Eckard and Associates, P.A. and a member in good standing of the Bar of the State of Florida, as attorney pro hac vice to argue or try this case in whole or in part as counsel. The undersigned was previously admitted Pro Hac Vice by this Honorable Court in the matter of Securities and Exchange Commission vs. Robert Durant, et al, EDNY Case No: 08-CV-1539, which is a corollary case to the instant case pending before this Court. See attached Exhibit C – Order for Admission to Practice Pro Hac Vice signed by the Honorable John Gleeson, United States District Court Judge, on May 14, 2008. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

/s/ Robert D. Eckard  
Robert D. Eckard, Esquire  
Florida Bar No: 0162655  
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and Associates, P.A.  
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Dated: January 27, 2009