

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION, INC., JOHN WILEY &
SONS, INC., THOMSON LEARNING INC., and
THE MCGRAW-HILL COMPANIES, INC.,

Case No. 07-CV-7890(PKC)

Plaintiffs,

v.

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

MATTHEW STIRLING D/B/A THE TEXTBOOK
GUY. COM AND JOHN DOES NOS. 1-5,

Defendants

PLEASE TAKE NOTICE that, upon the annexed declarations of Arthur G. Baumeister, Jr., Christ Gaetanos and the exhibits attached thereto, Defendant Mathew Stirling d/b/a TheTextbookGuy.com, will move this Court, before the Honorable P. Kevin Castel, at the United States Courthouse, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, as soon as counsel may be heard, for an Order pursuant to Local Civil Rule 1.3(c) of this Court admitting Christ Gaetanos *pro hac vice* in connection with the above-captioned matter, and for such other and further relief as the Court may deem just and proper.

Dated: Buffalo, New York
November 8, 2007

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**AMIGONE, SANCHEZ, MATTREY
& MARSHALL, LLP**

By: _____

Arthur G. Baumeister
Attorneys for Defendant Mathew Stirling
d/b/a thetextbookguy.com
1300 Main Place Tower, 350 Main Street
Buffalo, New York 14202
(716) 852-1300 (O)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION, INC., JOHN WILEY &
SONS, INC., THOMSON LEARNING INC., and
THE MCGRAW-HILL COMPANIES, INC.,

Plaintiffs,

v.

MATTHEW STIRLING D/B/A THE TEXTBOOK
GUY. COM AND JOHN DOES NOS. 1-5,

Defendants

Case No. 07-CV-7890(PKC)

**SPONSOR'S
DECLARATION IN SUPPORT
OF MOTION
TO ADMIT COUNSEL
*PRO HAC VICE***

I, Arthur G. Baumeister, Jr., declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner in Amigone, Sanchez, Mattrey & Marshall, LLP, counsel for Defendant Mathew Stirling d/b/a thetextbookguy.com in the above-captioned matter. I am familiar with the facts set forth herein and in support of this Defendant's motion to admit Christ Gaetanos, Esq. ("Applicant") as counsel *pro hac vice* to represent Defendants in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in New York in January 1987. I have been a member of the bar of the United States District Court for the Southern District of New York since May 17, 2005 and am in good standing with the Court.

3. I know Applicant, who is of counsel to Amigone, Sanchez, Mattrey & Marshall, LLP. I believe the Applicant to be an attorney of good character, competence and experience.

4. I submit herewith Applicant's Affirmation, which describes his experience and knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Evidence and the Local

Rules of the United States District Court for the Southern and Eastern Districts of New York.

5. I respectfully submit a proposed order Approving Applicant request for admission to the Bar of this Court *pro hac vice*.

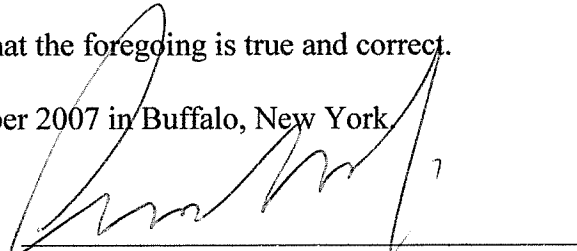
6. Mr. Gaetanos has advised me that counsel for the Plaintiffs, William Dunnegan, has stated that he does not oppose the relief requested herein.

WHEREFORE it is respectfully requested that the motion to admit Christ Gaetanos (of Amigone, Sanchez, Mattrey & Marshall, LLP) *pro hac vice* in this action as co-counsel for this Defendant be granted in all respects, together with such further relief as the Court deems just and proper.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of November 2007 in Buffalo, New York

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Arthur G. Baumeister, Jr. (AGB 2332)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PEARSON EDUCATION, INC., JOHN WILEY &
SONS, INC., THOMSON LEARNING INC., and
THE MCGRAW-HILL COMPANIES, INC.,

Case No. 07-CV-7890(PKC)

Plaintiffs,

v.

**DECLARATION IN SUPPORT
OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

MATTHEW STIRLING D/B/A THE TEXTBOOK
GUY. COM AND JOHN DOES NOS. 1-5,

Defendants

Christ Gaetanos declares as follows pursuant to 28 U.S.C. § 1746:

1. I am of counsel to Amigone, Sanchez, Mattrey & Marshall, LLP in Buffalo, New York, counsel for Defendant Mathew Stirling d/b/a thetextbookguy.com in the above captioned matter.

2. I submit this Declaration in support of the this Defendant's Motion to Admit Counsel *pro hac vice* in connection with this action pursuant to Local Civil Rule 1.3(c) of this Court.

3. I have been admitted to practice in New York State since February 12, 1980, and I am currently in good standing with the Bar of New York State. I have attached a certificate of good standing from the Supreme Court of the State of New York, Appellate Division, Fourth Department, as Exhibit A hereto.

4. I am admitted to practice before the United States District Court for the Western District of New York, and I have attached a certificate to this effect as Exhibit B. I have also been admitted as counsel or as counsel *pro hac vice* in various United State District Courts

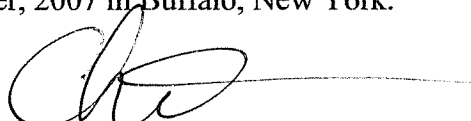
around the United States from time to time. I have never been disciplined by any court.

5. I have read and am familiar with: (a) the provisions of the Judicial Code which pertain to the jurisdiction of, and practice in, the United States District Courts; (b) the Federal Rules of Civil Procedure; (c) the Federal Rules of Evidence; and (d) the Local Rules of the United States District Court for the Southern and Eastern Districts of New York.

6. I will faithfully adhere to all rules applicable to my conduct in connection with any activities of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2007 in Buffalo, New York.



Christ Gaetanos