### UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA

Case No. 6:12-cv-01493-CEH-KRS

FIRST TIME VIDEOS, LLC,

Plaintiff,

v.

PAUL OPPOLD,

Defendant.

## UNOPPOSED RENEWED MOTION TO APPEAR *PRO HAC VICE* CONSENT TO DESIGNATION, AND REQUEST TO <u>ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING</u>

Pursuant to Local Rule 2.02, the undersigned respectfully moves for the admission *pro hac vice* of Meng Zhong, Esq. of the law firm of Lewis Roca Rothgerber, 3993 Howard Hughes Parkway, Suite 600, Las Vegas, Nevada 89169, telephone: (702) 474-2636, for purposes of appearance as co-counsel on behalf of Plaintiff First Time Videos, LLC, in the above-styled case only, to permit Meng Zhong, Esq. to receive electronic filings in this case, and in support thereof states as follows:

1. Meng Zhong, Esq. is not admitted to practice in the Middle District of Florida and is a member in good standing of the Bar of the State of Nevada, and of the United States District Court for the District of Nevada.

2. Movant, David K. Friedland, Esq., of the law firm of Friedland Vining, PA, 1500 San Remo Ave., Suite 200, Coral Gables, Florida 33146, telephone: (305) 777-1720, is a member in good standing of The Florida Bar and the United States District Court for the Middle District of Florida, maintains an office in this State for the practice of law, and is authorized to

# Case 6:12-cv-01493-CEH-KRS Document 53 Filed 01/02/14 Page 2 of 3 PageID 679 Case No. 6:12-cv-01493-CEH-KRS

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 documents in compliance with the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Meng Zhong, Esq. has made payment of this Court's \$10 admission fee. A certification in accordance with Local Rule 2.02 is attached hereto.

 Meng Zhong, Esq., by and through designated counsel, hereby requests the Court to provide Notice of Electronic Filings to Meng Zhong, Esq. at email address: MZhong@LRRLaw.com.

5. WHEREFORE, David K. Friedland, Esq., moves this Court to enter an Order permitting Meng Zhong, Esq., to appear before this Court on behalf of Plaintiff First Time Videos, LLC for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Meng Zhong.

Dated: January 2, 2014

Respectfully submitted,

### FRIEDLAND VINING, P.A.

s/David K. Friedland/ David K. Friedland Florida Bar No. 833479 Jaime Rich Vining Florida Bar No. 30932 1500 San Remo Ave., Suite 200 Coral Gables, FL 33146 Telephone: 305-777-1720 Fax: 305-456-4922

Case No. 6:12-cv-01493-CEH-KRS

e-mail: dkf@friedlandvining.com e-mail: jrv@ friedlandvining.com

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

Pursuant to Local Rule 3.01(g), I hereby certify the movant has conferred with counsel for Defendant in a good faith effort to resolve the issues raised in this motion and counsel for Defendant does not oppose the relief requested herein.

/s/ Jaime Rich Vining Jaime Rich Vining

## **CERTIFICATE OF SERVICE**

I hereby certify that on the above referenced date, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the Manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

#### Graham W. Syfert

Graham W. Syfert, Esq., PA 1529 Margaret St., Unit 2 Jacksonville, FL 32204 Email: graham@syfert.com Service via CM/ECF

> s/David K. Friedland David K. Friedland