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*Attorneys for Defendant
Borough of Upper Saddle River*

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BERGEN ROCKLAND ERUV
ASSOCIATION, YISROEL FRIEDMAN,
S. MOSHE PINKASOVITS, SARAH
BERGER, MOSES BERGER, CHAIM
BREUER, YOSEF ROSEN, and TZVI
SCHONFELD,

Plaintiffs,

vs.

THE BOROUGH OF UPPER SADDLE
RIVER,

Defendant.

Civil No.: 2:17-CV-05512-JMV-CLW

**NOTICE OF MOTION FOR
ADMISSION OF JOEL KURTZBERG AND ,
MARCI A. HAMILTON, ESQS.
PRO HAC VICE WITH CONSENT**

PLEASE TAKE NOTICE that the undersigned, attorneys for defendant

The Borough of Upper Saddle River, will apply for an Order on a date to be assigned by

this Court admitting Joel Kurtzberg of the firm Cahill Gordon & Reindel, LLP and Marci A. Hamilton of the University of Pennsylvania, *pro hac vice*.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, defendant The Borough of Upper Saddle River shall rely on the certifications of Bruce S. Rosen, Joel Kurtzberg and Marci A. Hamilton, filed herewith. Counsel for Plaintiffs have consented to this motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is also submitted herewith.

Respectfully submitted,

McCUSKER, ANSELM, ROSEN
& CARVELLI, P.C.
Attorneys for Defendant
The Borough of Upper Saddle River

By: /s/Bruce S. Rosen
Bruce S. Rosen, Esq.

Dated: November 1, 2017

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BERGEN ROCKLAND ERUV
ASSOCIATION, YISROEL FRIEDMAN,
S. MOSHE PINKASOVITS, SARAH
BERGER, MOSES BERGER, CHAIM
BREUER, YOSEF ROSEN, and TZVI
SCHONFELD,

Plaintiffs,

vs.

THE BOROUGH OF UPPER SADDLE
RIVER,

Defendant.

Civil No.: 2:17-CV-05512-JMV-CLW

**CERTIFICATION OF
BRUCE S. ROSEN, ESQ.
IN SUPPORT OF ADMISSION OF
JOEL KURTZBERG AND
MARCI HAMILTON, ESQS.
PRO HAC VICE**

BRUCE S. ROSEN, of full age, hereby certifies as follows:

1. I am an attorney at law in the State of New Jersey and the bar of this Court and am a Director in the firm of McCusker, Anselmi, Rosen & Carvelli, a Professional Corporation (“MARC”), attorneys for defendant The Borough of Upper Saddle River. I submit this Certification in support of the motion for the admission of Joel Kurtzberg of the firm Cahill Gordon & Reindel, LLP, 80 Pine Street, New York, NY 10005 and Marci A. Hamilton of University of Pennsylvania, 3814 Walnut Street, Philadelphia, PA 19104, pro hac vice pursuant to Civ. Rule 101.1(c).

2. The principal office of MARC for the practice of law is in Florham Park, New Jersey. MARC is authorized to practice in the State of New Jersey pursuant to R. 1:21-1(a).

3. All pleadings, briefs and other papers filed with the Court on behalf of defendant The Borough of Upper Saddle River have been and will continue to be signed by an attorney with the firm of MARC. MARC will be responsible for receiving and signing all pleadings, briefs and papers in these matters and for the conduct of Joel Kurtzberg and Marci A. Hamilton as counsel in this matter.

4. Payment, as required by Civ. Rule 101.1(c)(2) and R. 1:21-2(a), will be forwarded to the Lawyer's Fund for Client Protection and the U.S. District Court Clerk on behalf of Joel Kurtzberg and Marci A. Hamilton Esqs. upon their admittance pro hac vice, as appropriate.

5. Counsel for Plaintiffs, Yehudah Buchweitz, Esq. Of Weil, Gotshal & Manges LLP has consented to these pro hac admissions.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

By: /s/ Bruce S. Rosen
Bruce S. Rosen

Dated: November 1, 2017

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BERGEN ROCKLAND ERUV
ASSOCIATION, YISROEL FRIEDMAN,
S. MOSHE PINKASOVITS, SARAH
BERGER, MOSES BERGER, CHAIM
BREUER, YOSEF ROSEN, and TZVI
SCHONFELD,

Plaintiffs,

vs.

THE BOROUGH OF UPPER SADDLE
RIVER,

Defendant.

Civil No.: 2:17-CV-05512-JMV-CLW

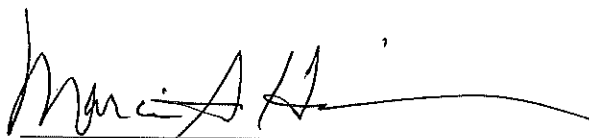
**CERTIFICATION OF
MARCI A. HAMILTON, ESQ.
IN SUPPORT OF NOTICE OF MOTION
FOR ADMISSION PRO HAC VICE**

MARCI A. HAMILTON, of full age, certifies as follows:

1. I am a Fox Professor of Practice at University of Pennsylvania, 3814 Walnut Street, Philadelphia, PA 19104. I am also the Chief Executive Officer and Academic Director at CHILD USA, 3535 Market Street, Office 3092, Philadelphia, PA 19104.
2. I am a member in good standing of the Bar of the State of Pennsylvania (1989), as well as the Bar of District of Columbia (1990).
3. I have never been, currently or in the past, suspended or disbarred in any court, state or federal, and no disciplinary proceedings are pending against me in any jurisdiction. No discipline has previously been imposed upon me in any jurisdiction.
4. I am not admitted to practice in the State of New Jersey.

5. I acknowledge my obligations under Local Civil Rule 101.1(c) of this Court.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.



Marci A. Hamilton

Dated: October 31, 2017

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BERGEN ROCKLAND ERUV
ASSOCIATION, YISROEL FRIEDMAN,
S. MOSHE PINKASOVITS, SARAH
BERGER, MOSES BERGER, CHAIM
BREUER, YOSEF ROSEN, and TZVI
SCHONFELD,

Plaintiffs,

vs.

THE BOROUGH OF UPPER SADDLE
RIVER,

Defendant.

Civil No.: 2:17-CV-05512-JMV-CLW

**CERTIFICATION OF
JOEL KURTZBERG, ESQ.
IN SUPPORT OF NOTICE OF MOTION
FOR ADMISSION PRO HAC VICE**

JOEL KURTZBERG, of full age, certifies as follows:

1. I am an attorney at law in the State of New York and am a Partner in the firm of Cahill Gordon & Reindel, LLP, 80 Pine Street, New York, NY 10005.

2. I am a member in good standing of the Bar of the State of New York (1997); as well as the Bars of: the United States Supreme Court (2001); the United States Courts of Appeals for the First Circuit (2012), Second Circuit (2001), Fourth Circuit (2011), Sixth Circuit (2010), Ninth Circuit (2014), and District of Columbia Circuit (2004); the United States District Court for the Southern District of New York (1997); the United States District Court for the Eastern District of New York (1997).

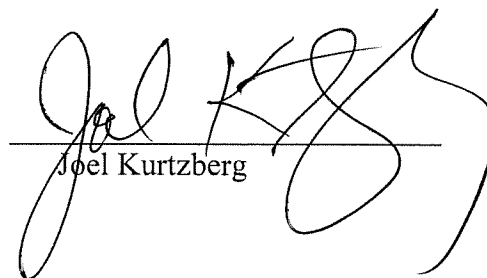
3. I have never been, currently or in the past, suspended or disbarred in any court, state or federal, and no disciplinary proceedings are pending against me in any jurisdiction. No discipline has previously been imposed upon me in any jurisdiction.

4. I am not admitted to practice in the State of New Jersey.

5. I acknowledge my obligations under Local Civil Rule 101.1(c) of this Court.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.

Dated: November 1, 2017



Joel Kurtzberg

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BERGEN ROCKLAND ERUV
ASSOCIATION, YISROEL FRIEDMAN,
S. MOSHE PINKASOVITS, SARAH
BERGER, MOSES BERGER, CHAIM
BREUER, YOSEF ROSEN, and TZVI
SCHONFELD,

Plaintiffs,

vs.

THE BOROUGH OF UPPER SADDLE
RIVER,

Defendant.

Civil No.: 2:17-CV-05512-JMV-CLW

**ORDER FOR PRO HAC VICE ADMISSION
OF JOEL KURTZBERG AND
MARCIA A. HAMILTON, ESQS.**

THIS MATTER having been brought before the Court by Bruce S. Rosen, Esq., of McCusker, Anselmi, Rosen & Carvelli, a Professional Corporation, attorneys for defendant The Borough of Upper Saddle River on a motion to allow Joel Kurtzberg of the firm Cahill Gordon & Reindel, LLP and Marci A. Hamilton of University of Pennsylvania to appear and participate pro hac vice, and the Court having considered the moving papers; and this matter being considered pursuant to Fed. Civ. R. 78, and for good cause shown;

IT IS on this ____ day of _____, 2017

ORDERED that The Borough of Upper Saddle River's motion is hereby granted; and it is further

ORDERED that Joel Kurtzberg, Esq., a member in good standing of the Bar of the State of New York and Marci A. Hamilton, Esq., a member in good standing

of the Bar of the State of Pennsylvania, be permitted to appear pro hac vice in the above-captioned matter pursuant to L. Civ. R. 101.1(c); and it is further

ORDERED that all pleadings, briefs and other papers filed with the Court shall be signed by a member or associate of the law firm McCusker, Anselmi, Rosen & Carvelli, PC, attorneys of record for The Borough of Upper Saddle River, who is admitted to the Bar of this Court and shall be held responsible for said papers and for the conduct of the case and who will be held responsible for the conduct of the attorneys admitted hereby; and it is further

ORDERED that Joel Kurtzberg and Marci A. Hamilton, Esqs., shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with L. Civ. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order; and it is further

ORDERED that Joel Kurtzberg and Marci A. Hamilton, Esqs., shall make a payment of \$150.00 to the Clerk of the United States District Court in accordance with L. Civ. R. 101.1(c)(3), as amended, within twenty (20) days from the date of the entry of this Order; and it is further

ORDERED that Joel Kurtzberg and Marci A. Hamilton, Esqs., shall be bound by the Rules of the United States District Court for the District of New Jersey, including, but not limited to the provisions of L. Civ. R. 13.1, Judicial Ethics and Professional Responsibility, and L. Civ. R. 104.1, Discipline of Attorneys; and it is further

ORDERED that Joel Kurtzberg and Marci A. Hamilton, Esqs., shall notify this Court immediately of any disciplinary charges brought against him in the Bar of any other court; and it is further

ORDERED that Joel Kurtzberg and Marci A. Hamilton, Esqs., shall each be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency Fee Rule, Rule 1:21-7, as amended; and it is further

ORDERED that McCusker, Anselmi, Rosen & Carvelli, P.C., may file a request, the form of which is available at the Court's website, with the Clerk of the Court for pro hac vice counsel to receive electronic notifications in this matter.
