

CLEARY GIACOBBE ALFIERI JACOBS, LLC
169 Ramapo Valley Road
Upper Level – Suite 105
Oakland, New Jersey 07436
Telephone: (973)845-6700
Facsimile: (201)644-7601
Attorneys for Defendant, The Township of Mahwah

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

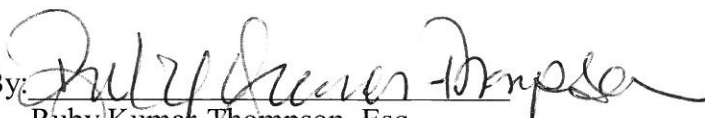
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	:	
BERGEN ROCKLAND ERUV ASSOCIATION,	:	
INC., YISROEL FRIEDMAN and S. MOSHE	:	
PINKASOVITZ	:	Case No. 17-cv-06054 (JMV)
	:	
Plaintiffs,	:	NOTICE OF MOTION TO
	:	ADMIT JAMES M.
v.	:	MCGUIRE, ESQ. <i>PRO HAC</i>
	:	<i>VICE</i>
THE TOWNSHIP OF MAHWAH	:	
	:	
Defendant.	:	
	:	
_____	x	

PLEASE TAKE NOTICE that on a date and time to be set by the Court, the undersigned, as local counsel for Defendant Township of Mahwah shall apply to the United States District Court for the District of New Jersey, for an order admitting James M. McGuire, Esq. *pro hac vice*, pursuant to Local Civil Rule 101.1(c).

PLEASE TAKE FURTHER NOTICE that in support of its Motion, Defendant hereby relies upon the attached Certifications of Richard A. Gantner, Esq. and James M. McGuire, Esq. A proposed form of Order is also submitted herewith.

Respectfully submitted,

CLEARY GIACOBBE ALFIERI JACOBS, LLC

By: 
Ruby Kumar-Thompson, Esq.
For the firm

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

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	:	
BERGEN ROCKLAND ERUV ASSOCIATION,	:	
INC., YISROEL FRIEDMAN and S. MOSHE	:	Case No. 17-cv-06054 (JMV)
PINKASOVITZ	:	
	:	CERTIFICATION OF JAMES
Plaintiffs,	:	M. MCGUIRE, ESQ. IN
	:	SUPPORT OF MOTION TO
v.	:	BE ADMITTED <i>PRO HAC</i>
	:	<i>VICE</i>
THE TOWNSHIP OF MAHWAH	:	
	:	
Defendant.	:	
	x	

I, James M. McGuire, Esq., of full age, hereby certify as follows:

1. I am a partner of the law firm Holwell Shuster & Goldberg LLP, 750 Seventh Ave, 26th Floor New York, NY 10019.
2. I make this Certification in support of Defendant’s motion for my admission *pro hac vice* pursuant to Local Civil Rule 101.1(c).
3. I was admitted to the bar of New York in 1982. The office maintaining the roll of members for the New York bar is the Clerk of the Court, Appellate Division, Second Judicial Department, 45 Monroe Place, Brooklyn, NY 11201.
4. I was admitted to the bar of the U.S. Court of Appeals for the Second Circuit in 1984. The office maintaining the roll of members for the bar of the U.S. Court of Appeals for the Second Circuit is the Clerk of the Second Circuit Court of Appeals, Thurgood Marshall United States Courthouse, 40 Centre Street, 18th Floor, New York, NY 10007.
5. I was admitted to the bar of the United States District Court for the Eastern District of New York in 1985. The office maintaining the roll of members for the bar of the

United States District Court for the Eastern District of New York is the Clerk of Court, U.S. Courthouse, 225 Cadman Plaza East, Brooklyn, NY 11201.

6. I was admitted to the bar of the United States District Court for the Southern District of New York in 1986. The office maintaining the roll of members for the bar of the United States District Court for the Southern District of New York is the Clerk of Court, Daniel P. Moynihan U.S. Courthouse, 500 Pearl Street New York, NY 10007.

7. My firm is counsel for the Defendant, the Township of Mahwah, and has been retained to represent it in the above-referenced action.

8. I will be associated with the firm Cleary, Giacobbe, Alfieri, Jacobs, LLC, which maintains offices at 169 Ramapo Valley Rd., Upper Level 105 Oakland, NJ 07436 and whose members are qualified to practice before the Courts of the State of New Jersey as well as this Court. I understand that all pleadings must be signed on behalf of the Defendant by Cleary, Giacobbe, Alfieri, Jacobs, LLC, authorized to appear before this Court. I further understand that an attorney from Cleary, Giacobbe, Alfieri, Jacobs, LLC must sign all papers, enter appearances for parties, sign stipulations, and sign and receive payments on judgments, decrees or orders.

9. Pursuant to Local Civil Rule 101(c)(3), I agree to pay the fee of \$150.00 to the Clerk of the United States District Court for the District of New Jersey upon approval by this Court admitting me to practice *pro hac vice* and I further agree to make a payment to the New Jersey Lawyers' Fund for Client Protection as required by New Jersey Court Rule 1:28-2(a) for the year 2017 upon my admission *pro hac vice* and will make additional payments for any additional year in which I continue to represent Defendant in this matter.

10. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed against me in any jurisdiction.

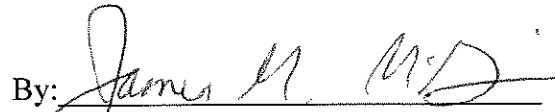
11. I respectfully request to be permitted to appear as counsel and advocate *pro hac vice* in this matter.

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

Date: November 14, 2017

Respectfully submitted,

HOLWELL SHUSTER & GOLDBERG LLP

By: 

James M. McGuire (jmcguire@hsgllp.com)
750 Seventh Avenue, 26th Floor
New York, NY 10019
(646) 837-5151

Counsel for Defendant, the Township of Mahwah

CLEARY GIACOBBE ALFIERI JACOBS, LLC

169 Ramapo Valley Road
Upper Level – Suite 105
Oakland, New Jersey 07436
Telephone: (973)845-6700
Facsimile: (201)644-7601

Attorneys for Defendant, The Township of Mahwah

ELECTRONICALLY-FILED

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

BERGEN ROCKLAND ERUV ASSOCIATION, :
INC., YISROEL FRIEDMAN and S. MOSHE :
PINKASOVITZ :

Plaintiffs, :

v. :

THE TOWNSHIP OF MAHWAH :

Defendant. :

Case No. 17-cv-06054 (JMV)

**CERTIFICATION OF LOCAL
COUNSEL IN SUPPORT OF
MOTION TO ADMIT JAMES
M. MCGUIRE, ESQ. *PRO HAC
VICE***

I, Richard A. Gantner, Esq. of full age and upon my oath, hereby certify as follows:

1. I am a Partner at the law firm of Cleary, Giacobbe, Alfieri, Jacobs, 169 Ramapo Valley Road, Upper Level-105, Oakland, New Jersey 07436. My firm is acting as local counsel for Defendant, Township of Mahwah, in connection with the above-referenced action.
2. I make this Certification in support of Defendant’s Motion to Admit James M. McGuire, Esq. of the law firm of Holwell Shuster & Goldberg, LLP, 750 Seventh Avenue, 26th

Floor, New York, New York 10019, *Pro Hac Vice*, and to appear in this action as co-counsel for Defendant Township of Mahwah.

3. I am admitted to practice before the Courts of the State of New Jersey and the United States District Court for the District of New Jersey since 1993. I am a member in good standing in both bars, as well as the bars of Pennsylvania, the United States District Court for the Eastern District of Pennsylvania, New York and Washington, D.C. I am not under suspension, disbarment or disciplinary proceedings by these courts or in any other court; nor has any discipline been imposed against me in any jurisdiction.
4. Pursuant to Local Civil Rule 101.1, I understand that my firm, as local counsel, must make all court appearances, sign all pleadings, briefs, stipulations, and other papers filed with the Court and receive all payments on judgments, decrees, or orders. It is further agreed that my firm, as local counsel, will be responsible for the conduct of all proceedings in this action, and that, Mr. McGuire's *pro hac vice* admission, if granted, will not affect Defendant's ability to strictly observe dates fixed for scheduling conferences, motions, pretrial conferences, trials or any other proceedings or to otherwise promptly request an adjournment, if warranted.
5. Accordingly, I respectfully request that the Court grant the request of Defendants for James M. McGuire, Esq, to be admitted *Pro Hac Vice* and participate in all proceedings in this matter.

Respectfully submitted,

CLEARY GIACOBBE ALFIERI JACOBS, LLC

By: /s/ Richard A. Gantner
Richard A. Gantner, Esq.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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	:	
BERGEN ROCKLAND ERUV ASSOCIATION,	:	Case No. 17-cv-06054 (JMV)
INC., YISROEL FRIEDMAN and S. MOSHE	:	
PINKASOVITZ	:	ORDER ADMITTING
	:	JAMES M. MCGUIRE, ESQ.
Plaintiffs,	:	PRO HAC VICE AS CO-
	:	COUNSEL TO DEFENDANT
v.	:	TOWNSHIP OF MAHWAH
	:	
THE TOWNSHIP OF MAHWAH	:	
	:	
Defendant.	:	
	x	

This matter having been brought before the Court by Cleary, Giacobbe, Alfieri, Jacobs, LLC, attorneys for Defendant, the Township of Mahwah, for an Order allowing James M. McGuire, Esq., to appear and participate in this action *pro hac vice*; and the Court having considered the submissions in support of the motion, and any papers submitted in opposition thereto, and this matter being considered pursuant to Fed. R. Civ. P. 78 and Local Civil Rule 101.1(c), and for good cause shown;

IT IS on this ____ day of _____, 2017,

ORDERED that the motion for the *pro hac vice* admission of James M. McGuire, Esq. is granted; and it is further

ORDERED that James M. McGuire, Esq. shall notify this Court immediately if any matter arises which affects his standing before the Bar of any State to which he has been admitted to practice; and it is further

ORDERED that James M. McGuire 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 Local

Civil Rule 103.1, Judicial Ethics and Professional Responsibility, and Local Civil Rule 104.1, Discipline of Attorneys; and it is further

ORDERED that counsel is deemed to consent to the appointment of the Clerk of the Court as the agent upon whom service of process may be made for all actions against counsel that may arise from counsel's participation in this matter; and it is further

ORDERED that James M. McGuire, Esq. shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2(a) for each year in which counsel represents the client in this matter and within twenty (20) days from the date of the entry of this order; and it is further

ORDERED that James M. McGuire shall make payment of \$150.00 to the Clerk of the United States District Court in accordance with Local Civil Rule 101.1(c)(3), within twenty (20) days from the date of entry of this Order.

IT IS SO ORDERED.

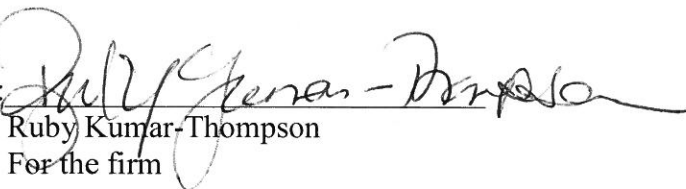
CATHY L. WALDER
United States Magistrate Judge

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on this day I caused a true and correct copy of the foregoing documents to be served via ECF upon counsel for the Plaintiffs.

Dated: November 17, 2017

CLEARY, GIACOBBE, ALFIERI, JACOBS, LLC

By: 
Ruby Kumar-Thompson
For the firm