

**FILED**

NOV 26 2018

9TH JUDICIAL CIRCUIT  
COUNTY OF KALAMAZOO  
KALAMAZOO, MICHIGAN

STATE OF MICHIGAN  
KALAMAZOO COUNTY CIRCUIT COURT

SCOTTSDALE CAPITAL  
ADVISORS CORPORATION,

Plaintiff,

v.

MORNINGLIGHTMOUNTAIN, LLC,  
MICHAEL GOODE, and DOES 1-10,

Defendants.

File No.: 2018—0153-CZ

Hon. Alexander C. Lipsey

Charles J. Harder (CA #184593) (pro hac vice to be filed)  
Jordan Susman (CA #246116) (pro hac vice to be filed)  
HARDER LLP  
Attorney for Plaintiff  
132 South Rodeo Dr., 4<sup>th</sup> Floor  
Beverly Hills, CA 90212  
424/203-1600

Joseph E. Richotte (P70902)  
BUTZEL LONG, PC  
Attorney for Defendants  
41000 Woodward Avenue  
Bloomfield Hills, MI 48304  
248/258-1616

H. Rhett Pinsky (P18920)  
PINSKY, SMITH, FAYETTE & KENNEDY, LLP  
Local Counsel for Plaintiff  
146 Monroe Center St., NW – Suite 805  
Grand Rapids, MI 49503  
616/451-8496

**PLAINTIFF'S MOTION FOR TEMPORARY ADMISSION OF OUT OF STATE  
ATTORNEY**

Plaintiff Scottsdale Capital Advisors Corp. ("SCA"), pursuant to Michigan Court Rule (MCR) 8.126, respectfully requests the temporary admission of out of state attorney, Jordan Susman, in the above-referenced case.

The contact information for Mr. Susman is as follows:

Jordan Susman  
Harder LLP  
132 South Rodeo Drive, Fourth Floor  
Beverly Hills, CA 90212  
(424) 203-1600  
[JSusman@HarderLLP.com](mailto:JSusman@HarderLLP.com)

Mr. Susman has associated with a local Michigan attorney, who has already entered an appearance, with contact information as follows:


H. Rhett Pinsky  
PINSKY, SMITH, FAYETTE & KENNEDY, LLP  
146 Monroe Center St., NW – Suite 805  
Grand Rapids, MI 49503  
(616) 451-8496  
[hrpinsky@psfklaw.com](mailto:hrpinsky@psfklaw.com)

This motion is supported by the accompanying affidavits of Mr. Susman (with current certificate of standing issued by California State Bar) and Mr. Pinsky and the document supplied by the State Bar of Michigan showing that the required fee has been paid.

PINSKY, SMITH, FAYETTE & KENNEDY, LLP  
Local Counsel for Plaintiff

Dated: November 21, 2018

By:



H. Rhett Pinsky (P18920)  
146 Monroe Center NW, Suite 805  
Grand Rapids, MI 49503  
(616) 451-8496

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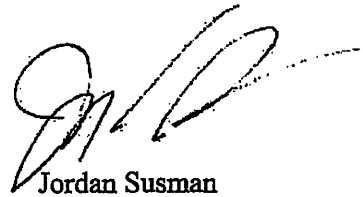
**AFFIDAVIT OF JORDAN SUSMAN IN SUPPORT OF PLAINTIFF'S MOTION FOR  
TEMPORARY ADMISSION OF OUT OF STATE ATTORNEY**

I, Jordan Susman, being first solemnly affirmed, on my affirmation, state that the foregoing is true and correct. If sworn as a witness, I can testify competently to the facts stated in this affidavit.

1. I submit this affidavit in support of the motion of Plaintiff Scottsdale Capital Advisors Corp. (“SCA”), pursuant to Michigan Court Rule (MCR) 8.126, for the temporary admission of me as an out of state attorney in the above-referenced case.
2. I have associated with a local Michigan attorney, H. Rhett Pinsky, who has already entered an appearance in this case.
3. The following are all jurisdictions in which I have sought licensure and have been licensed, including the corresponding bar numbers and licensure date:
  - a. California – State Bar No. 246116 – December 4, 2006.
4. I am currently eligible to practice law in all Courts within the State of California, and The Northern, Southern, Central, and Eastern District Courts of California.
5. Attached as Exhibit 1 hereto is a true and correct copy of my certificate of good standing issued by the California State Bar on October 29, 2018.
6. I am not, nor have I ever been, disbarred or suspended in any jurisdiction. I am not the subject of any pending disciplinary action.
7. I have had no bar complaints filed against me.
8. I have not sought permission to appear temporarily in Michigan within the past 365 days.
9. I am familiar with the Michigan Rules of Professional Conduct, Michigan Court Rules, and the Michigan Rules of Evidence.
10. By seeking permission to appear under MCR 8.126, I consent to the jurisdiction of Michigan’s attorney disciplinary system.

Dated: November 20, 2018

By:



Jordan Susman  
HARDER LLP  
132 South Rodeo Drive, Fourth Floor  
Beverly Hills, California 90212  
(424) 203-1600

**Exhibit 1**



# THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

(With Complaint Check Attached)

October 29, 2018

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JORDAN DAVID SUSMAN, #246116 was admitted to the practice of law in this state by the Supreme Court of California on December 4, 2006; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; that no charges of professional or other misconduct have been filed with the State Bar, nor any proceedings instituted by the State Bar; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Denise Velasco  
Custodian of Records

STATE BAR OF CALIFORNIA  
OFFICE OF CHIEF TRIAL COUNSEL  
COMPLAINT HISTORY REPORT (CONFIDENTIAL)

State Bar No: 246116 Name: Jordan D. Susman

<u>Case Number</u>	<u>Stage</u>	<u>Status</u>	<u>Complaint Date</u>	<u>Date Closed</u>	<u>Complainant</u>
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NO COMPLAINTS TO REPORT

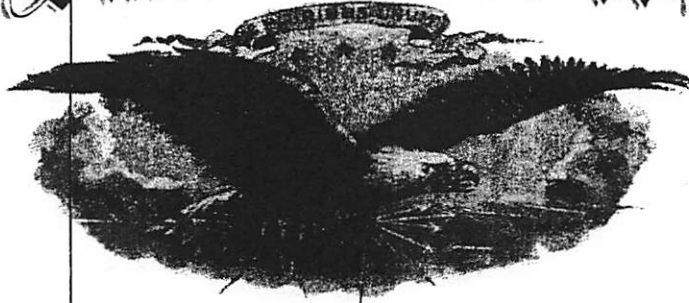
Please note that a complaint is defined as "a communication alleging misconduct by a State Bar member sufficient to warrant an investigation that may result in discipline of the member if allegations are proved." (Rules Proc. of State Bar, rule 5.4(13).) Therefore, allegations closed with the determination that the matter does not warrant investigation or allegations pending review to determine if they warrant investigation, are not included in Complaint History Reports.

We are unable to provide copies of the actual complaint(s) as such communications to the State Bar of California are privileged pursuant to California Business and Professions Code, section 6094(a).

This report identifies complaints and allegations received by the State Bar and not findings by the State Bar Court. Therefore, even where this report indicates the disposition of "Discipline," the report does not identify the findings supporting that discipline, which may differ substantially from the allegations received by the State Bar. Please consult the specific discipline documents to learn what findings of misconduct were made by the court. In most cases, such documents may be found on the public profile page for the attorney under Attorney Search at [www.calbar.ca.gov](http://www.calbar.ca.gov).



# United States Court of Appeals



For the  
First Circuit

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## Certificate of Good Standing

*I, Maria R. Hamilton, Clerk of the United States Court of Appeals for the First Circuit, do hereby certify that Jordan Susman was on the twenty-second day of November, in the year of our Lord, two thousand and seventeen, admitted to practice as an Attorney and Counsellor for the United States Court of Appeals for the First Circuit, and that said Attorney has ever since been in good standing.*

*In Testimony Whereof, Thereunto subscribe my name and affix the seal of the United States Court of Appeals for the First Circuit, this thirtieth day of October, in the year of our Lord, two thousand and eighteen.*



*Maria R. Hamilton*

*Clerk of the United States Court of Appeals for the First Circuit*

**Receipt****Pro Hac Vice Admission Receipt**

Jordan Susman

A copy of this receipt must be attached to the motion. The motion must be filed by the Michigan attorney in the court, administrative tribunal or agency, or in the arbitration in which you are seeking temporary admission.

By submitting these documents, you are NOT temporarily admitted. The motion and documents required by MCR 8.126 must be filed with the court, administrative tribunal or agency, or in the arbitration in which you are seeking temporary admission and the filing fee, if any, must be paid.

Only the court, administrative tribunal or agency, or arbitrator may enter an order allowing temporary admission. Once the order is entered, the Michigan attorney must email a copy of the order to [ProHacVice@michbar.org](mailto:ProHacVice@michbar.org) as soon as practicable.

Your payment was charged to Credit Card:

Payment Date: 11/20/2018

<b>Description</b>	<b>Amount</b>
CPF-Pro Hac Vice	<b>\$15.00</b>
Pro Hac Vice	<b>\$120.00</b>
<b>Total</b>	<b>\$135.00</b>

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**AFFIDAVIT OF H. RHETT PINSKY IN SUPPORT OF PLAINTIFF'S MOTION FOR  
TEMPORARY ADMISSION OF OUT OF STATE ATTORNEY**

I, H. Rhett Pinsky, being first solemnly affirmed, on my affirmation, state that the foregoing is true and correct. If sworn as a witness, I can testify competently to the facts stated in this affidavit.

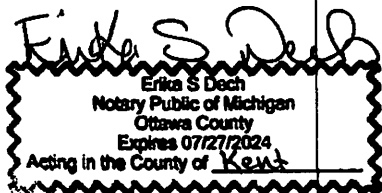
- 1 I submit this affidavit in support of the motion of Plaintiff Scottsdale Capital Advisors Corp. ("SCA"), pursuant to Michigan Court Rule (MCR) 8.126, for the temporary admission of out of state attorney, Jordan Susman in the above-referenced case.
- 2 I am an attorney licensed to practice law in all Courts within the State of Michigan. I am local counsel of record for Plaintiff SCA in this matter and have filed an appearance.
- 3 I have read Mr. Susman's affidavit in support of the motion and made a reasonable inquiry concerning the averments made therein. I believe Mr. Susman's representations are true, and I agree to ensure that the procedures of MCR 8.126 are followed.

Dated: November 20, 2018

By:



H. Rhett Pinsky (P18920)  
146 Monroe Center NW, Suite 805  
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**PROOF OF SERVICE**

Erika Dech, Legal Assistant at Pinsky, Smith, Fayette & Kennedy LLP, states that on November 21, 2018, she served **Plaintiff's Motion for Temporary Admission of Out of State Attorney, Affidavit of Jordan Susman in Support, Affidavit of H. Rhett Pinsky in Support, and Order Granting Plaintiff's Motion for Temporary Admission of Out of State Attorney** upon Joseph E. Richotte, BUTZEL LONG, PC, 41000 Woodward Avenue, Bloomfield Hills, MI 48304 and Jordan D. Susman, HARDER LLP, 132 South Rodeo Dr., 4<sup>th</sup> Floor, Beverly Hills, CA 90212 via first class mail, postage prepaid.

  
Erika Dech