

STATE OF MICHIGAN
KALAMAZOO COUNTY CIRCUIT COURT

SCOTTSDALE CAPITAL
ADVISORS CORPORATION,

File No.: 2018—0153-CZ

Plaintiff,

Hon. Alexander C. Lipsey

v.

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

Defendants.

Charles J. Harder (CA #184593) (pro hac vice to be filed)

Jordan Susman (CA #246116) (pro hac vice pending)

HARDER LLP

Attorney for Plaintiff

132 South Rodeo Dr., 4th 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, Margo Arnold, in the above-referenced case.

The contact information for Ms. Arnold is as follows:

Margo Arnold
Harder LLP
132 South Rodeo Drive, Fourth Floor
Beverly Hills, CA 90212
(424) 203-1600
MArnold@HarderLLP.com

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

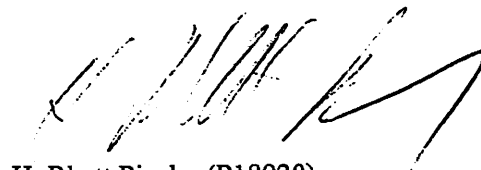
H. Rhett Pinsky
PINSKY, SMITH, FAYETTE & KENNEDY, LLP
146 Monroe Center St., NW – Suite 805
Grand Rapids, MI 49503
(616) 451-8496
hrpinsky@psfklaw.com

This motion is supported by the accompanying affidavits of Ms. Arnold (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: December 6, 2018

By:



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

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Local Counsel for Plaintiff
146 Monroe Center St., NW – Suite 805
Grand Rapids, MI 49503
616/451-8496

**AFFIDAVIT OF MARGO ARNOLD IN SUPPORT OF PLAINTIFF'S MOTION FOR
TEMPORARY ADMISSION OF OUT OF STATE ATTORNEY**

I, Margo Arnold, 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. 278288 – December 2011
4. I am currently eligible to practice law in all Courts within the State of California, the Northern, Southern, Central, and Eastern District Courts of California, and the United States Court of Appeals for the Ninth Circuit.
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 November 28, 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: December 4, 2018

By:

A handwritten signature in black ink, appearing to read 'M. Arnold', written over a horizontal line.

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

Please see the attached California All-Purpose Acknowledgment

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

**CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT
CIVIL CODE § 1189**

State of California

County of LOS ANGELES

On DECEMBER 4, 2018 before me, MARCIE LEIGH MORENO
Date Name and Title of the Officer

personally appeared MARGO ARNOLD
Name(s) of Signer(s)

who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature: Marcie Leigh Moreno
Signature of Notary Public



Place Notary Seal Above

OPTIONAL

Though this section is optional, completing this information can deter alteration of the document or fraudulent reattachment of this form to an unintended document.

Description of Attached Document

Title or Type of Document: AFFIDAVIT Document Date: 12.4.2018

Number of Pages: 3 Signer(s) Other Than Named Above: _____

Capacity(ies) Claimed by Signer(s)

Signer's Name: MARGO ARNOLD

- Corporate Officer -- Title(s): _____
- Partner -- Limited General
- Individual Attorney in Fact
- Trustee Guardian or Conservator
- Other: SELF

Signer's Name: _____

- Corporate Officer -- Title(s): _____
- Partner -- Limited General
- Individual Attorney in Fact
- Trustee Guardian or Conservator
- Other: _____

Signer Is Representing: SELF

Signer Is Representing: _____



THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

(With Complaint Check Attached)

November 28, 2018

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MARGO J. ARNOLD, #278288 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2011; 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: 278288 Name: Margo J. Arnold

<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.

Receipt

Pro Hac Vice Admission Receipt

Margo Arnold

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 as soon as practicable.

Your payment was charged to Credit Card:

Payment Date: 12/05/2018

Description	Amount
CPF-Pro Hac Vice	\$15.00
Pro Hac Vice	\$120.00
Total	\$135.00

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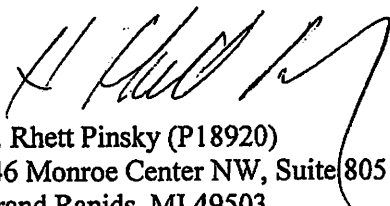
**AFFIDAVIT OF H. RHETT PINSKY IN SUPPORT OF PLAINTIFF'S MOTION FOR
TEMPORARY ADMISSION OF OUT OF STATE ATTORNEY**

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.

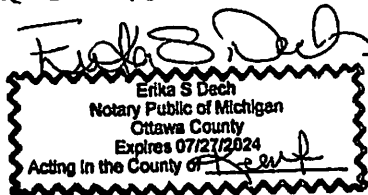
- 1 I submit this affidavit in support of the motion of Plaintiff Scottsdale Capital Advisors Corp. ("SCA"), pursuant to Michigan Court Rule (MCR) 8.126, for the temporary admission of out of state attorney, Margo Arnold in the above-referenced case.
- 2 I am an attorney licensed to practice law in all 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 Ms. Arnold's affidavit in support of the motion and made a reasonable inquiry concerning the averments made therein. I believe Ms. Arnold's representations are true, and I agree to ensure that the procedures of MCR 8.126 are followed.

Records 5
Dated: ~~November~~ 5, 2018

By:


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

*Subscribed and Sworn to
me on December 5th, 2018.*



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PROOF OF SERVICE

Erika Dech, Legal Assistant at Pinsky, Smith, Fayette & Kennedy LLP, states that on Dec 6, 2018, she served **(1) Plaintiff's Motion for Temporary Admission of Out of State Attorney, with supporting Affidavits and Exhibits; (2) Proposed Order Granting Plaintiff's Motion for Temporary Admission of Out of State Attorney; and (3) Receipt from the State Bar of Michigan** upon Joseph E. Richotte, BUTZEL LONG, PC, 41000 Woodward Avenue, Bloomfield Hills, MI 48304 and Jordan D. Susman, HARDER LLP, 132 South Rodeo Dr., 4th Floor, Beverly Hills, CA 90212 via first class mail postage prepaid.


Erika Dech