

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

United States of America,)	
)	
Plaintiff,)	
)	Case No.: 06-CV-00354-PB
vs.)	
)	Judge Paul J. Barbadoro
General Electric Company,)	
)	
Defendant)	

**MOTION FOR ORDER AUTHORIZING IGNACIA S. MORENO, ESQ.
TO BE ADMITTED *PRO HAC VICE***

Bret A. Cohen, Esq. (“Movant”) of the law firm of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. (“Mintz Levin”) requests this Court to enter an order pursuant to LR 83.2(b) authorizing Ignacia S. Moreno, Esq., corporate counsel for General Electric Company, to be admitted *pro hac vice* to appear and practice before this Court as Counsel to General Electric Company (“General Electric”), in this case. In support of this Motion, Movant states as follows:

1. Movant is a member in good standing of the bars of the State of New Hampshire and the Commonwealth of Massachusetts. Movant is in good standing with all courts in which he is admitted, and has never been the subject of a disciplinary proceeding as a practicing attorney.
2. Ms. Moreno is not a member of the United States District Court for the District of New Hampshire. Ms. Moreno is however, a member in good standing of the Courts in the District of Columbia, State of New York, and Commonwealth of Virginia and the United States Supreme Court. Ms. Moreno has never been the subject of a disciplinary proceeding as a practicing attorney.
3. Movant requests this Court to enter an order authorizing Ms. Moreno to be admitted *pro hac vice* to appear and practice before this Court as Counsel to General Electric. Attorney Moreno will abide by all rules of this Court unless waived with the Court’s permission.

4. This Motion is being served upon counsel to the United States of America, as well as every party that has entered an appearance in this case or requested service of all pleadings filed in this case.

WHEREFORE, Movant requests that this Court enter an Order:

1. Granting Movant's Motion to admit Ignacia S. Moreno, Esq., *pro hac vice*;
2. Finding that notice of this Motion as set forth in paragraph four (4) above is sufficient and proper under the circumstances; and
3. Granting Movant such other and further relief as is just and equitable.

Dated: November 5, 2008

/s/ Bret A. Cohen
Bret A. Cohen, Esquire
Bar No. 15989
Mintz, Levin, Cohn, Ferris,
Glovsky and Popeo, P.C.
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Boston, MA 02111
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Defendant)

AFFIDAVIT OF IGNACIA S. MORENO

STATE OF NEW YORK)
)
:ss)
COUNTY OF ALBANY)

Ignacia S. Moreno, being first duly sworn under oath, hereby swears and testifies:

1. My office address and telephone number are as follows:

General Electric Company
319 Great Oaks Blvd.
Albany, NY 12203

2. I am admitted to practice in the following courts:

- a. Courts in the District of Columbia
- b. Courts in the State of New York
- c. Courts in the Commonwealth of Virginia
- d. United States Supreme Court

3. I am in good standing and eligible to practice in each of the Courts listed.

4. I am not currently suspended or disbarred in any jurisdiction.

5. There are no pending disciplinary matters in which I am involved.

I declare under penalty of perjury that the foregoing is true and accurate. Further affiant sayeth not.

Ignacia S. Moreno

County of Suffolk
State of Massachusetts

Before me personally appeared Ignacia S. Moreno, known to me to be the person who executed the foregoing as his free act and will.

Subscribed and sworn to before me this ____ day of November, 2008.

Notary Public

My Commission Expires:

UNITED STATES DISTRICT COURT
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)	
Defendant)	

**ORDER GRANTING IGNACIA S. MORENO, ESQ. TO
BE ADMITTED PRO HAC VICE**

This Court having considered the Motion for Order Authorizing Ignacia S. Moreno, Esq. to Be Admitted *Pro Hac Vice* (the “Motion”), it is hereby ORDERED, ADJUDGED AND DECREED that:

1. Service of the Motion on counsel to the United States of America and all parties that have entered an appearance in this case was sufficient notice under the circumstances of this case.
2. Ms. Moreno is admitted *pro hac vice* and authorized to appear and practice before this Court on behalf of General Electric Company in this case.
3. Ms. Moreno shall abide by all rules of this Court except to the extent that permission to waive rules may be granted by this Court.

DATED:

United States District Court Judge

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AFFIDAVIT OF IGNACIA S. MORENO

STATE OF NEW YORK)
	:ss)
COUNTY OF ALBANY)

Ignacia S. Moreno, being first duly sworn under oath, hereby swears and testifies:

1. My office address and telephone number are as follows:

General Electric Company
319 Great Oaks Blvd.
Albany, NY 12203
(518) 862-2714

2. I am admitted to practice in the following courts:

- a. Courts in the District of Columbia
- b. Courts in the State of New York
- c. Courts in the Commonwealth of Virginia
- d. United States Supreme Court

3. I am in good standing and eligible to practice in each of the Courts listed.

4. I am not currently suspended or disbarred in any jurisdiction.

5. There are no pending disciplinary matters in which I am involved.

I declare under penalty of perjury that the foregoing is true and accurate. Further affiant sayeth not.

/s/ Ignacia S. Moreno
Ignacia S. Moreno

County of Suffolk
State of Massachusetts

Before me personally appeared Ignacia S. Moreno, known to me to be the person who executed the foregoing as his free act and will.

Subscribed and sworn to before me this 7th day of November, 2008.

/s/ Dawn M. Dayter
Dawn M. Dayter

My Commission Expires: