

United States, the United States Court of Appeals for the Second Circuit, and the United States District Courts for the Southern and Eastern Districts of New York.

4. Mr. Gradman is a member of the law firm Perry, Johnson, Anderson, Miller and Moskowitz LLP, which maintains its offices at 438 First Street, 4th Floor, Santa Rosa, California 95401.

5. Mr. Allinson is an associate at that same firm.

6. Mr. Gradman has been a member of good standing of the bar of the State of California since 2006. Mr. Gradman's November 2, 2020 Affirmation, attaching his Certificate of Good Standing from the State of California, is submitted in support of this application. His Affidavit states that he acknowledges and agrees that he shall be subject to the jurisdiction of the courts of the State of New York with respect to any acts occurring during the course of his participation in this matter, and that there are no disciplinary proceedings pending against him in the State of California or in any other jurisdiction.

7. Mr. Allinson has been a member of good standing of the bar of the State of California since 2012. Mr. Allinson's November 2, 2020 Affirmation, attaching his Certificate of Good Standing from the State of California, is submitted in support of this application. His Affidavit states that he acknowledges and agrees that he shall be subject to the jurisdiction of the courts of the State of New York with respect to any acts occurring during the course of his participation in this matter, and that there are no disciplinary proceedings pending against him in the State of California or in any other jurisdiction.

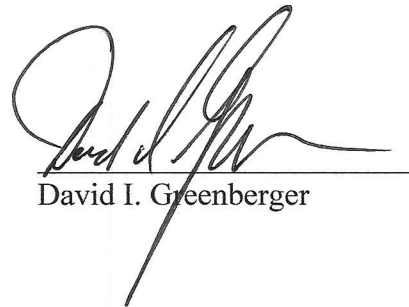
8. I have worked with Mr. Gradman and Mr. Allinson, and believe them to be of the highest integrity.

9. Mr. Gradman and Mr. Allinson have a close professional relationship with DW and Ellington, and are highly knowledgeable as to the underlying matters at issue in this appeal. In this regard, Mr. Gradman and Mr. Allinson were admitted *pro hac vice* on March 8, 2018 in the matter before the lower court from which this appeal originates (*See* NYSCEF Doc. No. 244).

10. I therefore respectfully submit that the *pro hac vice* admission of Mr. Gradman and Mr. Allinson is necessary to the effective representation of DW and Ellington in this matter.

WHEREFORE, it is respectfully requested that Mr. Gradman and Mr. Allinson be admitted *pro hac vice*.

Dated: New York, New York
November 2, 2020



David I. Greenberger