



SDNY (Rev. 10/2006) Pro Hac Vice Affidavit

**UNITED STATES DISTRICT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS SECURITIES AND  
ERISA LITIGATION

9 md 2017

This Document Applies to:

All Cases

**AFFIDAVIT OF  
STUART G. GROSS  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

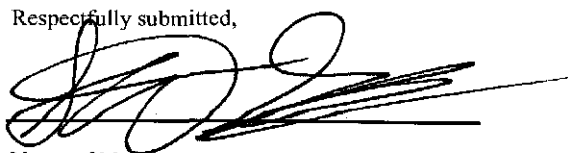
State of New York     )  
                                  )     ss:  
County of New York    )

Stuart G. Gross, being duly sworn, hereby deposes and says as follows:

1. I am an associate at the firm of Cotchett Pitre & McCarthy, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Jordanna G. Thigpen as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in November 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Jordanna G. Thigpen since 2009.
4. Ms. Thigpen is an associate at Cotchett, Pitre & McCarthy, in Burlingame, California.
5. I have found Ms. Thigpen to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Jordanna Thigpen, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Jordanna Thigpen pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Jordanna Thigpen pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: 3/22/10  
City, State: Burlingame, CA  
Notarized:

Respectfully submitted,  


Name of Movant: Stuart G. Gross  
SDNY Bar Code: (SD-4435)

**CALIFORNIA ALL-PURPOSE ACKNOWLEDGMENT**

State of California

County of SAN MATEO

On MARCH 22, 2010 before me, PHYLLIS LEE, NOTARY PUBLIC  
Date Here Insert Name and Title of the Officer

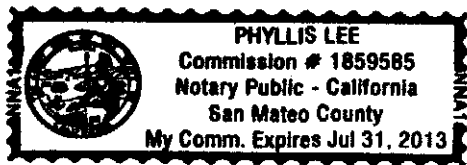
personally appeared STUART G. GROSS  
Name(s) of Signer(s)

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 \_\_\_\_\_  
Signature of Notary Public



Place Notary Seal Above

**OPTIONAL**

*Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.*

**Description of Attached Document**

Title or Type of Document: AFFIDAVIT OF STUART G. GROSS IN SUPPORT OF MOTION TO ASK FOR COUNSEL PRO HATE LICE

Document Date: \_\_\_\_\_ Number of Pages: \_\_\_\_\_

Signer(s) Other Than Named Above: \_\_\_\_\_

**Capacity(ies) Claimed by Signer(s)**

Signer's Name: \_\_\_\_\_

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



Signer Is Representing: \_\_\_\_\_

Signer's Name: \_\_\_\_\_

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



Signer Is Representing: \_\_\_\_\_

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LEHMAN BROTHERS SECURITIES AND ERISA  
LITIGATION

9 md 2017

This Document Applies to:

All Cases

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion Stuart G. Gross, attorney for:  
on behalf of the Monterey County Investment Pool, City of San Buenaventura, City of Burbank, City of Auburn, Vallejo Sanitation and Flood  
Control District, and Contra Costa Water District,  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Jordanna G. Thigpen  
Firm Name: Cotchett Pitre & McCarthy  
Address: 840 Malcolm Road, Suite 200  
City/State/Zip: Burlingame, CA 94010  
Telephone/Fax: (650) 697-6000/ (650) 697-0577  
Email Address: jthigpen@cpmlegal.com

is admitted to practice pro hac vice as counsel for Zenith Insurance Company, Lou Solton, Monterey County Treasurer,  
on behalf of the Monterey County Investment Pool, City of San Buenaventura, City of Burbank, City of Auburn, Vallejo Sanitation and Flood  
Control District, and Contra Costa Water District, in the above captioned case in the United States District Court  
for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules  
of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic  
Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).  
Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State:

United States District/Magistrate Judge



**THE STATE BAR  
OF CALIFORNIA**

**MEMBER SERVICES CENTER**

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

**CERTIFICATE OF STANDING**

February 24, 2010

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JORDANNA GABRIELLE THIGPEN, #232642 was admitted to the practice of law in this state by the Supreme Court of California on December 1, 2004; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Sima La Fontaine".

Sima La Fontaine  
Custodian of Membership Records

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a true and correct copies of the foregoing documents:

1. Motion to Admit Counsel Pro Hac Vice;
2. Affidavit of Stuart G. Gross in Support of Motion to Admit Counsel Pro Hac Vice;
3. Proposed Order for Admission Pro Hac Vice; and
4. Certificate of Standing;

to be filed with the Clerk of the Court on this date. The CM/ECF system will send notification to all counsel registered for CM/ECF.

Dated: March 22, 2010

**COTCHETT, PITRE & MCCARTHY**

By:   
STUART G. GROSS

840 Malcolm Road  
Burlingame, CA 94010  
Tel: (650) 697-6000  
Fax: (650) 697-0577