



March 24, 2003

Hon. Dominic S. Amato Br.11  
C/O Joan Smith-Clerk  
Milwaukee County Courthouse  
901 N. 9<sup>th</sup> St., Room 414  
Milwaukee, WI. 53233

Re: Case: GEOFFREY K. DAVIDIAN V. STEVE CORDER, ET AL  
CASE NO. 02-CV009453  
Our File: 2139  
Our client: Geoffrey Davidian D/B/A Putnam Pit

Dear Ms. Smith:

Enclosed please find our MOTION FOR ADMISSION PRO HAC VICE, AFFIDAVIT OF SAMUEL JOSEPH HARRIS, and proposed ORDER for the Court's signature, submitted pursuant to Rule 323 of the Rules of the First Judicial District.

Thank you for your courtesy in that regard.

Very truly yours,

Geoffrey Davidian, paralegal

GKD/gkd

Enclosures

CC: Raymond Pollen

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STATE OF WISCONSIN : CIRCUIT COURT : MILWAUKEE COUNTY

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GEOFFREY DAVIDIAN,

Plaintiff

vs.

CASE No. 02-CV-009453

STEVE CORDER,

JIM SHIPLEY,

T. MICHAEL O'MARA,

and,

JOHN DUFFY

Defendants

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MOTION FOR ADMISSION PRO HAC VICE

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LAWRENCE P. ZIEGER, of the LAW OFFICES OF LAWRENCE P. ZIEGER S.C., moves this Honorable Court to enter an Order admitting SAMUEL JOSEPH HARRIS to appear and practice before this Honorable Court pro hac vice, on behalf of Plaintiff, GEOFFREY K. DAVIDIAN and only in the above-titled cause, based on the Affidavit of Samuel Joseph Harris attached hereto, and in support thereof, shows unto this Honorable Court, as follows:

1. Samuel Joseph Harris is an attorney at law, duly licensed and practicing as such in the State of Tennessee, he having been admitted on January 31, 1996, and in the State of Pennsylvania on December 2, 1992. Mr. Harris is no longer on active status with the Pennsylvania Bar.

2. He represents Plaintiff Geoffrey K. Davidian in other matters arising from Plaintiff's activities publishing his newspaper and Web site from Wisconsin.
3. He is not now, and has not been, under any Orders of Discipline by the Bar Association
4. As to matters arising during or pertaining to the above-entitled cause, he subjects and submits himself to the full disciplinary powers of this Court to the same extent as if he were fully admitted to practice in this Court and the State of Wisconsin.
5. I am a member in good standing of the Wisconsin State Bar Association, who appears of record in this cause on behalf of the Plaintiff, GEOFFREY K. DAVIDIAN.

WHEREFORE, Plaintiff, GEOFFREY K. DAVIDIAN, respectfully requests that this Honorable Court grant the instant Motion and allow SAMUEL JOSEPH HARRIS to appear and practice before this Honorable Court pro hac vice on behalf of Plaintiff GEOFFREY K. DAVIDIAN.

By: \_\_\_\_\_

Lawrence P. Zieger

Attorney for Plaintiff Geoffrey K. Davidian

First National Bank Building

735 N. Water Street, Suite 836

Milwaukee, WI. 53202

(414) 277-8484

Fax: (414) 289-7720

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STATE OF WISCONSIN : CIRCUIT COURT : MILWAUKEE COUNTY

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GEOFFREY DAVIDIAN,

Plaintiff

vs.

CASE No. 02-CV-009453

STEVE CORDER,

JIM SHIPLEY,

T. MICHAEL O'MARA,

and,

JOHN DUFFY

Defendants

---

AFFIDAVIT OF SAMUEL JOSEPH HARRIS

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1. My name is Samuel Joseph Harris and I make this Affidavit from personal knowledge and if I am called upon to testify to the facts contained therein I am competent to do so.
2. I am a member of the Harris Law Firm, whose offices are located at 9 South Jefferson St., P.O. Box 873, Cookeville, TN. 38503, telephone number 931-372-7227.
3. I am the attorney for Plaintiff, GEOFFREY K. DAVIDIAN, in matters regarding his newspaper, The Putnam Pit, and Web site , in which he publishes news articles and opinion about Cookeville, TN., and its officials from his home and office in Shorewood, WI.

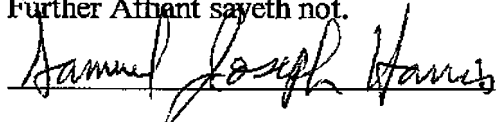
4. I am not a resident of Wisconsin. I am not regularly employed in Wisconsin, nor am I regularly engaged in business, professional or other similar activities in Wisconsin.

5. I am a member in good standing with the State Bar of Tennessee and eligible to practice before all courts, both trial and appellate, in the State of Tennessee and admitted to the United States District Court for the Middle District of Tennessee. (See Attached Certificate of Good Standing).

6. I have not been subjected to any discipline by any court or administrative body, and am not currently suspended or disbarred in any court.

7. I declare under penalty of perjury that the foregoing is true and correct.

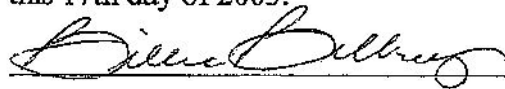
Further Affiant sayeth not.



**SAMUEL JOSEPH HARRIS**

Subscribed and sworn to before me

this 17th day of 2003.



Notary Public, State of Tennessee

My Commission expires 8-23-05



**CERTIFICATE OF GOOD STANDING**

**UNITED STATES OF AMERICA**

} ss.

**MIDDLE DISTRICT OF TENNESSEE**

I, Vicki Kinkade, Acting Clerk of the United States District Court for the Middle District of Tennessee,

DOES HEREBY CERTIFY That **SAMUEL J. HARRIS** was duly admitted to practice in said Court on March 18 1996 and is in good standing as a member of the bar of said Court.



Dated at Nashville, Tennessee

on March 10, 2003

Vicki Kinkade, Acting Clerk

By Althea Straughter

Deputy Clerk



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STATE OF WISCONSIN : CIRCUIT COURT : MILWAUKEE COUNTY

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GEOFFREY K. DAVIDIAN

Plaintiff,

V.

Case No. 02-CV009453

Case Code: 30106  
30301  
30704

STEVE CORDER,

T. MICHAEL O'MARA,

JIMMY DALE SHIPLEY

AND

JOHN C. DUFFY

Defendants.

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**ORDER FOR ADMISSION  
PRO HAC VICE  
ATTORNEY SAMUEL J. HARRIS**

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**PLEASE TAKE NOTICE** that;

Following a following a motion to this Court for admission of Attorney Samuel J. Harris,

**PRO HAC VICE** , by attorney Lawrence P. Zieger and upon the affidavit of Attorney

Samuel J. Harris and his **CERTIFICATE OF GOOD STANDING** Dated March 10, 2003;

**IT IS HEREBY ORDERED** that;

Samuel J. Harris be admitted to practice before this Court **PRO HAC VICE**.

Dated at Milwaukee, this \_\_\_\_\_ day of March, 2003

BY THE COURT

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Honorable Dominic S. Amato  
Circuit Court Judge, Branch 11

**Post Office Address:**

Milwaukee County Courthouse  
901 N. 9<sup>th</sup> Street, Room 414  
Milwaukee, WI. 53233