

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

\_\_\_\_\_/

Wood Mountain Fish, LLC

Plaintiff,

v.

Mowi ASA (fka Marine Harvest ASA)

Case No. 1:19-cv-22128-UU

*et al,*

Defendants.

\_\_\_\_\_/

**MOTION TO APPEAR *PRO HAC VICE*,  
CONSENT TO DESIGNATION, AND REQUEST TO  
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Fred T. Isquith of the law firm of Wolf Haldenstein Adler Freeman & Herz LLP, 270 Madison Avenue, New York, NY (telephone: (212) 545-4600), for purposes of appearance as co-counsel on behalf of Wood Mountain Fish, LLC, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, and to permit Fred T. Isquith to receive electronic filings in this case, and in support thereof states as follows:

1. Fred T. Isquith is not admitted to practice in the Southern District of Florida and is a member in good standing of the State Bar of New York and Washington D.C., the U.S. Court of Appeals for the First, Second, Fourth, and Eighth Circuits, and the U.S. District Courts for the Eastern and Southern Districts of New York, the Western and Eastern Districts of Michigan, the Central and Northern Districts of Illinois, and the District of Nebraska. Mr. Isquith is also admitted to practice before the United States Supreme Court.

2. Movant, Jayne A. Goldstein, Esquire, of the law firm of Shepherd Finkelman Miller & Shah LLP, 1625 N. Commerce Parkway, Suite 320, Ft. Lauderdale, FL 33326 (telephone: (954) 515-0123) is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Fred T. Isquith has made payment of this Court's \$75.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Fred T. Isquith, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Fred T. Isquith at email address: isquith@whafh.com.

WHEREFORE, Jayne A. Goldstein, moves this Court to enter an Order admitting Fred T. Isquith to appear before this Court *pro hac vice* on behalf of Wood Mountain Fish, LLC, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Fred T. Isquith at email address: isquith@whafh.com

Date: June 4, 2019

Respectfully submitted,

/s/ Jayne A. Goldstein

Jayne A. Goldstein (FL Bar No. 144088)

**Shepherd Finkelman Miller & Shah LLP**

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*Attorneys for Wood Mountain Fish, LLC*