

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE**

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Lisa Sykes, et al., \*  
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\*  
Plaintiffs, \* 1:08-MC-13-JM  
\*  
\*  
vs. \* 3-07 CV 660  
\* Eastern District of Virginia  
\*  
Bayer Corporation, et al. \*  
\*  
\*  
Defendants. \*  
\*  
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**MOTION FOR ADMISSION PRO HAC VICE**

NOW COMES Brian T. Stern, Esquire, and states as follows:

1. This matter is pending before the United States District Court for the Eastern District of Virginia, docket number 3-07 CV 660.
2. In that matter, a resident of New Hampshire was subpoenaed for a deposition.
3. The noticed deponent filed a Motion to Quash in this Court leading to an Order to Show Cause for Plaintiff’s counsel, Clifford Shoemaker, of Vienna, Virginia.
4. The underlying action is a pharmaceutical case for damages to a minor child resulting from drugs containing thimerosal, a mercury-based preservative..
5. To respond to the Order to Show Cause, Plaintiff’s counsel retained John F. McHugh, Esquire, of New York, an attorney familiar with the nature of the litigation, as well as a friend who agreed to act *pro bono*.

6. Attorney McHugh is a prudent selection for counsel in this case and is in good standing with the Bar of Courts of the United States as supported by the Affidavit attached hereto.

7. Admission *pro hac vice* is permitted under Local Rule 83.2.

8. The undersigned movant will remain actively associated with the Attorney McHugh for purpose of representing Attorney Shoemaker with regard to this Court's Order to Show Cause dated April 21, 2008.

WHEREFORE, Brian T. Stern respectfully requests that Attorney John F. McHugh be admitted *pro hac vice* in association with Attorney Brian T. Stern for purposes of this Court's Order to Show Cause dated April 21, 2008.

Respectfully submitted,

Dated: May 5, 2008

/s/ Brian T. Stern  
Brian T. Stern  
Law Offices of Brian T. Stern, P.A.  
USDC NH Bar #2441  
86 Locust Street  
Dover, NH 03820  
(603) 742-7789  
E-mail: [contact@sternlawoffice.com](mailto:contact@sternlawoffice.com)