UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:19-cv-22629-FAM

DIEGO TRINIDAD,

Plaintiff,

v.

EXPEDIA, INC.,

Defendant.
_____/

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

In accordance with Local Rule 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 Cheryl Joseph of the law firm of SCOTT DOUGLASS & MCCONNICO LLP, 301 Colorado St, Suite 2400, Austin, Texas 78701, (512) 495-6356, for purposes of appearance as co-counsel on behalf of Defendant Expedia, Inc., in the above-styled case, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Cheryl Joseph to receive electronic filings in this case, and in support thereof states as follows:

1. Cheryl Joseph is not admitted to practice in the Southern District of Florida and is a member of good standing of the Bar of the State of Texas. She has studied the Local Rules for the United States District Court for the Southern District of Florida.

2. Movant, Lolita T. Sosa, of the law firm of AKERMAN LLP, Three Brickell City Centre, 98 Southeast Seventh Street, Suite 1100, Miami, Florida 33131, telephone: (305) 982-5680, 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 sys-

tem. 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 all documents and things that may be filed electronically, and who shall be responsible for filing 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, Cheryl Joseph has made payment of this Court's $75 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Cheryl Joseph, 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 Cheryl Joseph at email address: cjoseph@scottdoug.com.

WHEREFORE, Lolita T. Sosa, moves this Court to enter an Order that Cheryl Joseph may appear before this Court on behalf of Expedia, Inc. for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Cheryl Joseph. A proposed Order is attached as **Exhibit 1**.

Dated: November 22, 2019

Respectfully submitted,

AKERMAN LLP
Three Brickell City Centre
98 Southeast Seventh Street, Suite 1100
Miami, FL 33131
(305) 374-5600 Telephone
(305) 349-4656 Facsimile

By: */s/ Lolita T. Sosa*
Lolita T. Sosa
Florida Bar No. 121113
lolita.sosa@akerman.com

Counsel for Defendant Expedia, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:19-cv-22629-FAM

DIEGO TRINIDAD,

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EXPEDIA, INC.,

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CERTIFICATION OF CHERYL JOSEPH

Cheryl Joseph, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the Bar of the State of Texas (Bar Number 24104015), the Bar of the District of Columbia, the Bar of the State of New York (Registration Number 5169974), and the United States District Court for the District of Columbia; and (3) I have not filed three or more motions for *pro hac vice* admission in this District within the last 365 days.

/s/ Cheryl Joseph
Cheryl Joseph

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:19-cv-22629-FAM

DIEGO TRINIDAD,

Plaintiff,

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EXPEDIA, INC.,

Defendant.
_____/

[PROPOSED] ORDER GRANTING MOTION FOR CHERYL JOSEPH TO APPEAR *PRO HAC VICE*, CONSENT TO DESIGNATION, AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING

This matter comes before the Court upon the Motion to Appear *Pro Hac Vice* for Cheryl Joseph, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures.

Having reviewed the Motion, and otherwise being fully advised, it is hereby **ORDERED AND ADJUDGED** that the Motion [ECF No. __] is **GRANTED**. Cheryl Joseph may appear and participate in this action on behalf of Defendant Expedia, Inc. The Clerk shall provide electronic notification of all electronic filings to Cheryl Joseph, at cjoseph@scottdoug.com.

DONE AND ORDERED in Chamber in Miami, Florida, this ____ day of November 2019.

_____
FEDERICO A. MORENO
UNITED STATES DISTRICT JUDGE

Copies furnished to:
All Counsel of Record