

David P. Silk, Esq.
dsilk@curtisthaxter.com

April 22, 2024

VIA HAND DELIVERY

Matthew Pollack, Esq.
Clerk of the Law Court
Maine Supreme Judicial Court
205 Newbury Street, Room 139
Portland, Maine

RE: *Peter Masucci, et al. v. Judy's Moody LLC, et al.*,
Law Court Docket No. CUM-2024-82

Dear Mr. Pollack:

Enclosed for filing in the above-referenced matter, please find an original and one copy of the following:

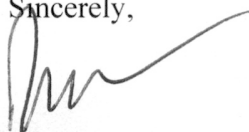
1. Motion for Admission of Visiting Attorney *Pro Hac Vice* With Incorporated Memorandum of Law
2. Affidavit In Support of Motion for Admission *Pro Hac Vice* (Christopher Kieser, Esq.)

Also enclosed is a check in the amount of the required filing fee (\$700).

Copies of the enclosed are being served via electronic service and via U.S. Mail upon the *pro se* party noted below.

Thank you for your assistance in this matter.

Sincerely,



David P. Silk, Bar No. 3136

Enclosures

Copy to (w/encs.): Robert H. Thomas, Esq. (rthomas@pacificlegal.com)
Paige Gilliard, Esq. (pgilliard@pacificlegal.com)
Benjamin E. Ford, Esq. (bford@archipelagolaw.com)

REC'D CUMB CLERKS OFC
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April 22, 2024

Page 2

Sandra L. Guay, Esq. (sguay@archipelagolaw.com)
Gordon R. Smith, Esq. (gsmith@verrill-law.com)
Joseph G. Talbot, Esq. (jtalbot@perkinsthompson.com)
Emily A. Arvizu, Esq. (earvizu@perkinsthompson.com)
Scott W. Boak, AAG (scott.boak@maine.gov)
Lauren Parker, AAG (lauren.parker@maine.gov)
Orlando Delogu (orlandodelogu@maine.rr.com)
640 Ocean Avenue, Apt. 319, Portland, ME 04103

STATE OF MAINE

SUPREME JUDICIAL COURT
SITTING as the Law Court
Docket No. CUM-2024-82

PETER AND KATHY MASUCCI,)	
et al.,)	
)	
Plaintiffs/Appellants,)	MOTION FOR ADMISSION
)	OF VISITING ATTORNEY
)	<i>PRO HAC VICE</i>
v.)	WITH INCORPORATED
)	MEMORANDUM OF LAW
JUDY'S MOODY LLC, et al.,)	
)	(Title to Real Estate Involved)
Defendants/Appellees.)	

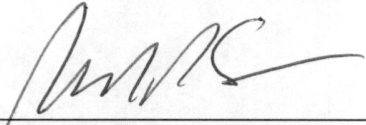
The undersigned local counsel for Defendant, Appellee, and Cross-Appellant Judy's Moody LLC in this action, hereby moves this Court, pursuant to 4 M.R.S. § 802, Rule 2A(b)(2)(C) of the Maine Rules of Appellate Procedure, and Rule 89(b) of the Maine Rules of Civil Procedure, for an order admitting Christopher Kieser of the law firm Pacific Legal Foundation, 555 Capitol Mall, Suite 1290, Sacramento, California 95814, email: ckieser@pacifical.org, a member in good standing of the Bar of the State of California and an attorney admitted before the courts of the state of California and trial courts, to appear in this appeal as a visiting attorney *pro hac vice* on behalf of Defendant, Appellee, and Cross-Appellant Judy's Moody, LLC.

I certify that I am a member in good standing of the Bar of the State of Maine and that am actively associated with Christopher Kieser, Esq. in this appeal. This motion is supported by the affidavit of Christopher Kieser, Esq. filed contemporaneously herewith.

REC'D CUMB CLERKS OFC
APR 22 '24 PM3:23

WHEREFORE, Defendant, Appellee and Cross-appellant Judy's Moody LLC respectfully moves for the admission of Christopher Kieser, Esq. as a visiting attorney to work in association with the undersigned in this appeal.

Dated: April 22, 2024



David P. Silk, Bar No. 3136
CURTIS THAXTER LLC
One Canal Plaza, Suite 1000/P.O. Box 7320
Portland, Maine 04112-7320
207-774-9000
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*Attorneys for Defendant, Appellee
and Cross-Appellant
Judy's Moody LLC*

CERTIFICATE OF SERVICE

The undersigned certified that on April 22, 2024, I caused a copy of the foregoing MOTION FOR ADMISSION OF VISITING ATTORNEY *PRO HAC VICE* be served on counsel for the parties listed below, pursuant to Rule 10(b) of the Maine Rules of Appellate Procedure and Rule 5(b) of the Maine Rules of Civil Procedure, via electronic mail, addressed as follows:

Benjamin E. Ford, Esq.
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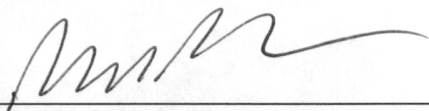
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scott.boak@maine.gov

A copy of the foregoing has been served upon the following *pro se* party via U.S. Mail, as follows:

Orlando Delogu, 640 Ocean Avenue, Apt. 319, Portland, ME 04103

Dated: April 22, 2024



David P. Silk, Bar No. 3136
CURTIS THAXTER LLC

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PETER AND KATHY MASUCCI,)
et al.,)
)
Plaintiffs/Appellants,)
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v.)
)
JUDY'S MOODY LLC, et al.,)
)
Defendants/Appellees.)

AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION
PRO HAC VICE

(Title to Real Estate Involved)

I, Christopher Kieser of Indiana, hereby state under oath as follows:

1. I am an attorney residing in Granger, Indiana, and a member of the law firm of Pacific Legal Foundation. I am a member in good standing of the Bar of the State of California and have been admitted to practice in the following courts as of the date indicated in parentheses:

- U.S. District – Central California (2015)
- U.S. District – Eastern California (2015)
- U.S. District – Northern Illinois (2020)
- U.S. District – Northern Indiana (2019)
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- U.S. Court of Appeals - Federal Circuit (2022)
- U.S. Supreme Court (2019)

2. I have not been suspended or disbarred in any court.

3. In the course of this representation of defendant, appellee, and cross-appellant Judy's Moody LLC, I will be associated with David P. Silk of the law firm Curtis Thaxter LLC, One Canal Plaza, Suite 1000, P. O. Box 7320, Portland, Maine 04112-7320. Attorney Silk will serve as local counsel with authority to act as attorney of record for all purposes.

Dated: April 18, 2024




CHRISTOPHER KIESER
CA Bar No. 298486
PACIFIC LEGAL FOUNDATION
555 Capitol Mall, Suite 1290
Sacramento, CA 95814
Telephone: (916) 419-7111
CKieser@pacificlegal.org

STATE OF INDIANA)
COUNTY OF St Joseph SS.)

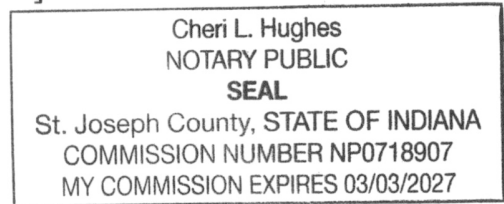
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Personally appeared before me, Christopher Kieser, who, after being duly sworn, made oath that the foregoing statements made by him on personal knowledge are true and correct and, where based on information and belief, he believes them to be true.


Notary Public/Attorney-At-Law

Commission Expires: 03-03-2027

[SEAL]



CERTIFICATE OF SERVICE

The undersigned certified that on April __, 2024, I caused a copy of the foregoing AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE* be served on counsel for the parties listed below, pursuant to Rule 10(b) of the Maine Rules of Appellate Procedure and Rule 5(b) of the Maine Rules of Civil Procedure, via electronic mail, addressed as follows:

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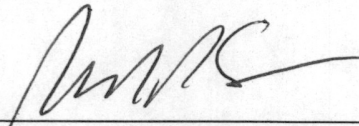
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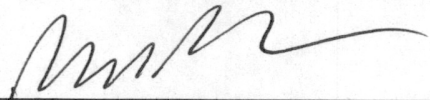
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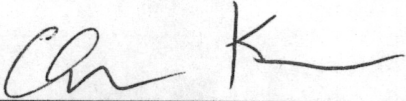
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STATE OF INDIANA)
COUNTY OF St Joseph SS.)

April 18th, 2024

Personally appeared before me, Christopher Kieser, who, after being duly sworn, made oath that the foregoing statements made by him on personal knowledge are true and correct and, where based on information and belief, he believes them to be true.

Cheri L. Hughes
Notary Public/Attorney-At-Law

Commission Expires: 03-03-2027

[SEAL]

Cheri L. Hughes
NOTARY PUBLIC
SEAL
St. Joseph County, STATE OF INDIANA
COMMISSION NUMBER NP0718907
MY COMMISSION EXPIRES 03/03/2027

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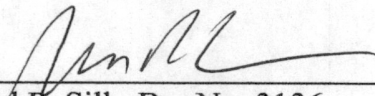
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