

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

CASE NO.: 16-cv-61752-Dimitrouleas/Snow

VENUS FASHION, INC.,

Plaintiff,

vs.

CHANGCHUN CHENGJI TECHNOLOGY  
CO., LTD.  
AUKEY INTERNATIONAL LIMITED, and  
AUKEY E-BUSINESS CO., LTD.,

Defendants.

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**Motion For Allan Gabriel 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 Special Rules Governing the Admission and Practice 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 Allan Gabriel of the law firm of Dykema Gossett LLP, 333 S. Grand Avenue, Suite 2100, Los Angeles, CA 90071, for purposes of appearance as co-counsel on behalf of Plaintiff, Venus Fashion, Inc., in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Allan Gabriel to receive electronic filings in this case, and in support thereof states as follows:

1. Allan Gabriel is not admitted to practice in the Southern District of Florida and is a member in good standing of the State Bar of California, as well as the United States District Court for the Central District of California, United States District Court for the Northern District of California, and the United States District Court for the Southern District of California.

2. Movant, Peter A. Chiabotti of the law firm of Akerman LLP, 777 South Flagler Drive, Suite 1100 West Tower, West Palm Beach, FL, 33401, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, 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 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, Allan Gabriel has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Allan Gabriel, 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 the following e-mail address: agabriel@dykema.com.

WHEREFORE, Peter A. Chiabotti moves this Court to enter an Order allowing Allan Gabriel to appear before this Court on behalf of Plaintiff for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Allan Gabriel.

Respectfully submitted,

**AKERMAN LLP**

Dated: July 27, 2016

By: /s/ Peter A. Chiabotti  
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*Attorneys for Plaintiff Venus Fashion, Inc.*

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**Certification Of Allan Gabriel**

Allan Gabriel, Esquire, pursuant to Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida and (2) I am a member in good standing of the State Bar of California, as well as the United States District Court for the Central District of California, United States District Court for the Northern District of California, and the United States District Court for the Southern District of California.



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Allan Gabriel

**Certificate Of Service**

I hereby certify that on July 27, 2016, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system and that a true and correct copy of the foregoing was served this July 27, 2016 by transmission of Notices of Electronic Filing generated by CM/ECF or via e-mail to all parties on the attached Service List.

/s/ Peter A. Chiabotti  
Peter A. Chiabotti

**Service List**

<p><b>Attorneys For Plaintiff</b></p> <p>Allan Gabriel Dykema Gossett PLLC 333 South Grand Avenue, Suite 2100 Los Angeles, CA 90071 Telephone: 213-457-1800 Facsimile: 213-457-1850 agabriel@dykema.com</p> <p>Aaron D. Charfoos Dykema Gossett PLLC 10 S. Wacker Drive, Suite 2300 Chicago, IL 60606 Telephone: (312) 876-1700 Facsimile: (312) 876-1155 aچارfoos@dykema.com</p> <p>David Otero Florida Bar No. 651370 Akerman LLP 50 N. Laura Street, Suite 3100 Jacksonville, FL 32202 Telephone: (904) 798-3700 Facsimile: (904) 798-3730 david.otero@akerman.com</p> <p>Peter A. Chiabotti Florida Bar No. 0602671 Akerman LLP 777 South Flagler Drive Suite 1100, West Tower West Palm Beach, FL 33401 Telephone: (561) 653-5000 Facsimile: (561) 659-6313 peter.chiabotti@akerman.com</p>	
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**Order Granting Motion For Allan Gabriel To Appear *Pro Hac Vice*, Consent To Designation And Request To Electronically Receive Notices Of Electronic Filing**

THIS CAUSE having come before the Court on the Motion for Allan Gabriel to Appear *Pro Hac Vice*, Consent to Designation and Request to Electronically Receive Notices of Electronic Filing (the "Motion"), pursuant to the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures. This Court having considered the motion and all other relevant factors, it is hereby

ORDERED AND ADJUDGED that:

The Motion is GRANTED. Allan Gabriel may appear and participate in this action on behalf of Plaintiff. The Clerk shall provide electronic notification of all electronic filings to Allan Gabriel at agabriel@dykema.com.

DONE AND ORDERED in Chambers at \_\_\_\_\_, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2016.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

Copies furnished to:  
All Counsel of Record