

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

March 19, 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* (of Paige Gilliard, 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)
Sandra L. Guay, Esq. (sguay@archipelagolaw.com)

RECD ME SUPREME JUD CT
MAR 19 '24 PM 1:07

March 19, 2024

Page 2

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-24-82

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

MOTION FOR ADMISSION
OF VISITING ATTORNEY
PRO HAC VICE
WITH INCORPORATED
MEMORANDUM OF LAW

(Title to Real Estate Involved)

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 Paige Elizabeth Gilliard of the law firm Pacific Legal Foundation, 3100 Clarendon Boulevard, Suite 1000, Arlington, VA 22201, email: pgilliard@pacificlegal.org, a member in good standing of the Bar of the State of California and an attorney admitted before the courts of the California Supreme Court and all trial courts, the United States District Court, Central District of California, the United States Court of Appeals, Eighth Circuit, and the United States Court of Appeals, Ninth Circuit, to appear in this appeal as a visiting attorney *pro hac vice* on behalf of Defendant, Appellee, and Cross-Appellant Judy's Moody, LLC.

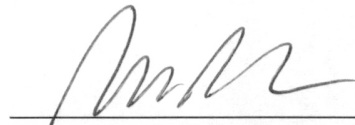
I certify that I am a member in good standing of the Bar of the State of Maine and that am actively associated with Paige Elizabeth Gilliard, Esq. in this appeal.

RECEIVED
MAR 19 2024
Clerk's Office
Maine Supreme Judicial Court

This motion is supported by the affidavit of Paige Elizabeth Gilliard filed contemporaneously herewith.

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

Dated: March 19, 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
dsilk@curtisthaxter.com

*Attorneys for Defendant, Appellee
and Cross-Appellant
Judy's Moody LLC*

CERTIFICATE OF SERVICE

The undersigned certified that on March 19, 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.
ARCHIPELAGO
bford@archipelagona.com

Joseph G. Talbot, Esq.
PERKINS THOMPSON, P.A.
jtalbot@perkinsthompson.com

Sandra L. Guay, Esq.
ARCHIPELAGO
sguay@archipelagonacom

Emily A. Arvizu, Esq.
PERKINS THOMPSON, P.A.
earvizu@perkinsthompson.com

Lauren E. Parker, AAG
OFFICE OF THE ATTORNEY GENERAL
lauren.parker@maine.gov

Gordon R. Smith, Esq.
VERRILL DANA LLP
gsmith@verrill-law.com

Scott W. Boak, AAG
OFFICE OF THE ATTORNEY GENERAL
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: March 19, 2024



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

STATE OF MAINE

SUPREME JUDICIAL COURT
SITTING as the Law Court
Docket No. CUM-24-82

PETER AND KATHY MASUCCI,)
et al.,)
)
Plaintiffs/Appellants,)
)
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, Paige Elizabeth Gilliard of Virginia, hereby state under oath as follows:

1. I am an attorney residing in Alexandria, Virginia, 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:

- California Supreme Court and all trial courts (2020)
- United States District Court, Central District of California (2022)
- United States Court of Appeals, Eighth Circuit (2022)
- United States Court of Appeals, Ninth Circuit (2022)

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

RECD ME SUPREME JUD CT
MAR 19 '24 PM1:07

CERTIFICATE OF SERVICE

The undersigned certified that on March 19, 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:

Benjamin E. Ford, Esq.
ARCHIPELAGO
bford@archipelagona.com

Joseph G. Talbot, Esq.
PERKINS THOMPSON, P.A.
jtalbot@perkinsthompson.com

Sandra L. Guay, Esq.
ARCHIPELAGO
sguay@archipelagonacom

Emily A. Arvizu, Esq.
PERKINS THOMPSON, P.A.
earvizu@perkinsthompson.com

Lauren E. Parker, AAG
OFFICE OF THE ATTORNEY GENERAL
lauren.parker@maine.gov

Gordon R. Smith, Esq.
VERRILL DANA LLP
gsmith@verrill-law.com

Scott W. Boak, AAG
OFFICE OF THE ATTORNEY GENERAL
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: March 19, 2024



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