

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 20-cv-81205-RAR

SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

v.

A COMPLETE BUSINESS SOLUTIONS GROUP, INC, *et al*

Defendant.

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

In accordance with Local Rules 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 Mark E. Cedrone of the law firm of Cedrone & Mancano, LLC 230 S. Broad Street Suite 1100 Philadelphia, PA 19102, (215) 925-2500, mec@cedrone-mancano.com, purposes of appearance as co-counsel on behalf of Rod Ermel Associates, Inc, Rod Ermel, and Ken Bacon in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Mark E. Cedrone to receive electronic filings in this case, and in support thereof states as follows:

1. Mark E. Cedrone is not admitted to practice in the Southern District of Florida and is a member in good standing of the Pennsylvania Bar and the United States District Court for the Eastern District of Pennsylvania.

2. Movant, Henry P. Bell, Esquire, of the law firm of Bell Rosquete Reyes Esteban, PLLC 999 Ponce De Leon Blvd. Suite 112-PH Coral Gables, Florida 33134 305-570-1610, hbell@brresq.com 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 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 and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving 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 Mark E. Cedrone has made payment of this Court's \$ 200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Mark E. Cedrone, 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 Mark E. Cedrone at email address: mec@cedrone-mancano.com.

WHEREFORE, Henry P. Bell, moves this Court to enter an Order Mark E. Cedrone, to appear before this Court on behalf of Rod Ermel Associates, Inc, Rod Ermel, and Ken Bacon for all purposes relating to the proceedings in the above-styled

matter and directing the Clerk to provide notice of electronic filings to Mark E. Cedrone.

Date: June 20, 2022

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 20, 2022, a true and correct copy of the foregoing has been furnished electronically via CMCEF to all counsel of record.

Respectfully submitted,

BELL ROSQUETE REYES ESTEBAN, PLLC.

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*Attorneys for Rod Ermel Associates, Inc, Rod Ermel
& Ken Bacon*

By: s/ Henry P. Bell

HENRY P. BELL

Fla. Bar No. 0090689

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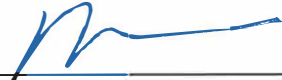
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CERTIFICATION OF MARK E. CEDRONE

Mark E. Cedrone, Esquire, 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 Pennsylvania Bar and the United States District Court for the Eastern District of Pennsylvania; and (3) I have not filed three or more motions for pro hac vice admission in this District within the last 365 days.

Dated June 20, 2022



Mark E. Cedrone, Esq.

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Plaintiff,

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Defendant.

_____ /

**ORDER GRANTING MOTION 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 to Appear *Pro Hac Vice* for Mark E. Cedrone, Consent to Designation, and Request to Electronically Receive Notices of Electronic Filing pursuant to the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys in the United States District Court for the Southern District of Florida and Section 2B of the CM/ECF Administrative Procedures (ECF _____). This Court having considered the motion and all other relevant factors, it is hereby -

ORDERED AND ADJUDGED that the motion is GRANTED.

Mark E. Cedrone may appear and participate in this action on behalf of Rod Ermel Associates, Inc, Rod Ermel, and Ken Bacon. The Clerk shall provide electronic notification of all electronic filings to Mark E. Cedrone at mec@cedrone-mancano.com.

Signature on Next Page

DONE AND ORDERED in Chambers at West Palm Beach, Florida, this

_____ day of June 2022.

Bruce E. Reinhart
United States Magistrate Judge

Copies furnished to: All Counsel of Record
Clerk of the Court