

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Case No. 8:20-cv-00325-MSS-MRM

Plaintiff,

v.

BRIAN DAVISON, BARRY M. RYBICKI,
EQUIALT LLC, EQUIALT FUND, LLC,
EQUIALT FUND II, LLC, EQUIALT
FUND III, LLC, EA SIP, LLC,

Defendants, and

128 E. DAVIS BLVD, LLC, et al.,

Relief Defendants.

**UNOPPOSED MOTION FOR SPECIAL ADMISSION OF
GAYLE M. BLATT**

Pursuant to Local Rule 2.01(c), the undersigned respectfully moves for the admission *pro hac vice* of Gayle M. Blatt, for purposes of appearance as co-counsel on behalf of Plaintiffs in *Gleinn, et al. v. Wassgren, et al.*, Case No. 8:20-cv-01677-MSS-CPT (the “Investor Plaintiffs”), in the above-styled case only and states the following:

1. Ms. Blatt is an attorney at Casey Gerry Schenk Francavilla Blatt & Penfield LLP, 110 Laurel Street, San Diego, CA 92101.

2. Ms. Blatt is neither a Florida resident nor a member in good standing of The Florida Bar.

3. Ms. Blatt is a member in good standing of a bar of a United States district court; specifically, Southern District of California.

4. Ms. Blatt has not abused the privilege of special admission by maintaining a regular law practice in Florida. Ms. Blatt has initially appeared in the last thirty-six months in the case below in state or federal court in Florida:

Date Admitted	Case Name	Case Status	Case Number
04/22/20	<i>Hayes, et al., v. Tony James Michael Kelly, Lifeline Innovations & Insurance Solutions LLC, John Albino Marques, and Gregory Talbot</i>	Dismissed	20-cv-00935-TPB-AEP Middle District of FL
08/17/20	<i>Gleinn, et al., v. Wassgren, et al.</i>	Active	8:20-cv-01677-MSS-CPT Middle District of FL
06/28/21	<i>Desue, et al. v. 20/20 Eye Care Network, et al.</i>	Active	0:21-cv-61275-RAR Southern District of FL
07/26/21	<i>Saul Hymes, et al., v Earl Enterprises Holdings</i>	Active	2021-CA-007617-O Ninth Judicial Circuit in and for Orange County, FL
01/27/22	<i>Timothy Pickell, et al., v Florida Digestive Health Specialists, LLP</i>	Active	2022-CA-000336AX Twelfth Judicial Circuit in and for Manatee County, FL
04/21/22	<i>Marica O'Neal and David Siu v. Joseph Financial Investment Advisors, LLC.</i>	Dismissed	8:22-cv-00939-MSS-JSS Middle District of FL

5. Ms. Blatt affirms she will comply with the federal rules and this Court's local rules.

6. Ms. Blatt is familiar with and will be governed by 28 U.S.C. § 1927.

7. Ms. Blatt in compliance with Local Rule 2.01(b)(1)(E), affirms the oath, which states: I will support the Constitution of the United States. I will bear true faith and allegiance to the government of the United States. I will maintain the respect due to the courts of justice and all judicial officers. I will well and faithfully discharge my duties as an attorney and officer of this Court. I will conduct myself uprightly and according to the law and the recognized standards of ethics of the legal profession.

8. Movant, Adam M. Moskowitz, of The Moskowitz Law Firm, 2 Alhambra Plaza, Suite 601, Coral Gables, FL 33134, Telephone: (305) 740-1423, is a Florida resident, a member in good standing of the Florida Bar and the United States District Court for the Middle District of Florida and is authorized to file through the Court's electronic filing system.

9. In accordance with the local rules of this Court, and upon filing the instant motion, Gayle M. Blatt has made payment of this Court's \$150 special admission fee.

10. Upon entry of an order granting Ms. Blatt's admission *pro hac vice*, Ms. Blatt affirms she will register with the Middle District of Florida's CM/ECF system and hereby requests the Court to provide Notice of Electronic Filings to Gayle M. Blatt at her email address: gmb@cglaw.com.

WHEREFORE, Adam M. Moskowitz, respectfully moves this Court to enter an Order authorizing Gayle M. Blatt to appear before this Court on behalf of Investor Plaintiffs, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Gayle M. Blatt.

CERTIFICATE OF COMPLIANCE WITH MEET
AND CONFER REQUIREMENT

Pursuant to Local Rule 3.01(g), counsel for the Investor Plaintiffs conferred with counsel for the Receiver, the SEC, Brian Davison and Barry Rybicki. The Receiver, the SEC, and Messrs. Davison and Rybicki do not object to the relief sought by this motion.

Date: December 16, 2022

Respectfully submitted,

By: s/Adam M. Moskowitz

Adam M. Moskowitz

Fla. Bar No. 984280

Howard M. Bushman

Fla. Bar No. 0364230

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Attorneys for Investor Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2022:

1. I caused the foregoing to be electronically filed with the Clerk of the Court by using the CM/ECF system which will send notification of such filing to all attorneys of record.

By: /s/ Adam M. Moskowitz
Adam M. Moskowitz, Esq.