

**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  
FRANCIS J. BALINT, JR.**

Pursuant to Local Rule 2.01(c), the undersigned respectfully moves for the admission *pro hac vice* of Francis J. Balint, Jr., 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. Mr. Balint is an attorney at Bonnett Fairbourn Friedman & Balint, PC, 7301 N. 16<sup>th</sup> Street, Suite 102, Phoenix, AZ, 85020.

2. Mr. Balint is not a resident of Florida and is not a member in good standing of the Florida Bar.

3. Mr. Balint is a member in good standing of the State Bars of Arizona and Virginia and the United States District Courts for the Districts of Arizona and Eastern Virginia.

4. Mr. Balint has not abused the privilege of special admission by maintaining a regular law practice in Florida. Mr. Balint has initially appeared in the last thirty-six months in these cases in the federal court in Florida:

<b>Date Admitted</b>	<b>Case Name</b>	<b>Case Status</b>	<b>Case Number</b>
1/23/2020	<i>Clinton, et al., v. Security Benefit Life Ins. Co.</i>	Transferred to District of Kan.	1:19-cv-24803-KMW Southern District of Fla.
3/5/2020	<i>Rubinstein, et al., v. EquiAlt, et al.</i>	Voluntary Dismissal	8:20-cv-00448-WFJ-TGW Middle District of Fla.
5/6/2020	<i>Fruitstone v. Spartan Race, Inc.</i>	Settled/Closed	1:20-cv-20836-BB Southern District of Fla.
8/5/2020	<i>Gleinn, et al., v. Wassgren, et al.</i>	Active	8:20-cv-01677-MSS-CPT Middle District of Fla.

5. Mr. Balint affirms he will comply with the federal rules and this Court's local rules.

6. Mr. Balint is familiar with, and will be governed by, 28 U.S.C. § 1927.

7. Mr. Balint, 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, Francis J. Balint, Jr. has made payment of this Court's \$150 special admission fee.

10. Upon entry of an order granting Mr. Balint's admission *pro hac vice*, Mr. Balint affirms he will register with the Middle District of Florida's CM/ECF system and hereby requests the Court to provide Notice of Electronic Filings to Francis J. Balint, Jr. at his email address: [fbalint@bffb.com](mailto:fbalint@bffb.com).

WHEREFORE, Adam M. Moskowitz, respectfully moves this Court to enter an Order authorizing Francis J. Balint, Jr. 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 Francis J. Balint, Jr.

**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 28, 2022.

Respectfully submitted,

By: /s/ Adam M. Moskowitz

Adam M. Moskowitz

Fla. Bar No. 984280

Howard M. Bushman

Fla. Bar No. 0364230

**THE MOSKOWITZ LAW FIRM, PLLC**

2 Alhambra Plaza, Suite 601

Coral Gables, Florida 33134

Telephone: (305) 740-1423

Facsimile: (786) 298-5737

Adam@moskowitz-law.com

[Howard@moskowitz-law.com](mailto:Howard@moskowitz-law.com)

*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 Moskowitz  
Adam M. Moskowitz, Esq.