

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

No. 3:14CV1790 (VLB)

FEBRUARY 24, 2015

MOTION FOR ADMISSION OF
BENJAMIN R. KURTIS AS VISITING ATTORNEY

Pursuant to Rule 83.1(d) of the Local Rules of Civil Procedure for the United States District Court for the District of Connecticut, the undersigned member of the bar of this Court respectfully moves for the entry of an order permitting Benjamin R. Kurtis, an associate with the law firm of Fox Rothschild LLP, which maintains an office at Princeton Pike Corporate Center, 997 Lenox Drive, Building 3, Lawrenceville, NJ 08648-2311, to be admitted as a Visiting Attorney for the purpose of representing defendants Beta Pharma, Inc. and Don Zhang in the above-captioned action.

Mr. Kurtis is an active member in good standing of the State Bar of New Jersey and of the bars of the Supreme Court of the Commonwealth of Pennsylvania and the United States District Court for the District of New Jersey.

142

There are no pending disciplinary proceedings against Mr. Kurtis any state or federal court. His Affidavit in support of this motion is attached.

Payment to the clerk of the fee of \$75.00 for Mr. Kurtis, as a visiting attorney, as required by Local Rule 83.1(d)(3), accompanies this motion.

WHEREFORE, the undersigned respectfully requests that Mr. Kurtis be admitted to this Court as a Visiting Attorney as set forth herein.

/s/

Michael G. Caldwell (ct26561)
LeClairRyan, A Professional Corporation
545 Long Wharf Drive, Ninth Floor
New Haven, Connecticut 06511
Telephone: (203) 672-1636
Facsimile: (203) 672-1656
Email michael.caldwell@leclairryan.com
-- Attorney for Defendants Beta Pharma, Inc.
and Don Zhang --

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2015 a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/

Michael G. Caldwell (ct 26561)

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

ZHAOYIN WANG,
Plaintiff,

v.

BETA PHARMA, INC., DON ZHANG,
AND ZHEJIANG BETA PHARMA
CO., LTD.,
Defendants.

No. 3:14CV1790 (VLB)

FEBRUARY 11, 2015

**AFFIDAVIT OF BENJAMIN R. KURTIS IN SUPPORT OF
MOTION FOR ADMISSION AS A VISITING ATTORNEY**

I, Benjamin R. Kurtis, having been duly sworn, do hereby state as follows:

1. I am over eighteen (18) years of age and believe in the obligations of an oath.
2. I submit this Affidavit in support of the motion for my admission as a Visiting Attorney to appear as counsel on behalf of defendants Beta Pharma, Inc. and Don Zhang ("Defendants") in the above-captioned matter.
3. I am an associate with the law firm of Fox Rothschild LLP, which maintains an office at Princeton Pike Corporate Center, 997 Lenox Drive, Building 3, Lawrenceville, NJ 08648-2311. My telephone number at Fox Rothschild is (609) 895-3303, my facsimile number is (609) 896-1469, and my email address is BKurtis@foxrothschild.com.

4. I am a member in good standing of the State Bar of New Jersey and my bar identification number is 029492010.

5. I am a member in good standing of the Bar of the Supreme Court for the Commonwealth of Pennsylvania and my bar identification number is 309417.

6. I am a member in good standing of the bar of the United States District Court for the District of New Jersey. That court does not issue public bar identification numbers.

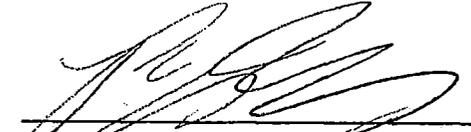
7. I do not have any pending disciplinary complaints as to which a finding has been made that the complaint should proceed to a hearing. I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice before this Court or any other court, while facing a disciplinary complaint.

8. I have fully reviewed and am familiar with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the District of Connecticut, and the Connecticut Rules of Professional Conduct.

9. I designate Michael G. Caldwell as my sponsoring attorney and my agent for service of process. I designate the District of Connecticut as the forum for the resolution of any dispute arising out of my admission.

10. I request permission to appear and participate as counsel in the above-captioned action on behalf of Defendants for all purposes, in association with local counsel, Michael G. Caldwell of LeClairRyan, P.C., 545 Long Wharf Drive, 9th Floor, New Haven, CT 06511.

I declare under penalty of perjury that the foregoing is true and correct.



Benjamin R. Kurtis

Before me personally appeared Benjamin R. Kurtis, signer of the foregoing instrument, and he acknowledged the same to be his free act and deed, for the purposes contained herein.



Notary Public
My commission expires _____

