

NO. 2023-08495

**Janice Dean, Myra Arellano, Matthew
Blumrick, Daisy Hernandez, and Jorge
Estepa**

Plaintiffs; Counter-Defendants,

vs.

Pegasus Fund, LLC

Defendant; Counter-Plaintiff.

In the District Court of

Harris County, Texas

151st Judicial District

MOTION FOR ADMISSION PRO HAC VICE OF RAUL J. SLOEZEN

Raul J. Sloezen, moves this Court for an order qualifying Raul J. Sloezen, counsel at the Law Offices of Raul J. Sloezen, to act as co-counsel on behalf of Pegasus Fund, LLC, admitting him to practice *pro hac vice* in this action, and declaring him to be eligible to participate in the proceeding on the following grounds:

1. My office, Law Offices of Raul J. Sloezen, is located at 18 Hasbrouck Avenue, Emerson, New Jersey 07630, has telephone number (973) 928-6821, and is retained to represent Pegasus Fund, LLC.

2. Joshua Thane, Esq., Texas State Bar No. 24060713, of the offices of Haltom & Doan, 6500 Summerhill Road, Suite 100 Texarkana, TX 75503 Telephone: (903) 255-1000 Facsimile: (903) 255-0800 Email: jthane@haltomdoan.com has been designated as co-counsel in this case.

3. I have not appeared or sought leave to appear or participate in Texas Courts within the past two years.

4. I was admitted to practice law in the State of New Jersey on June 6, 1991 and admitted to practice law in the State of New York on April 5, 1994. I have also been admitted to practice law before the United States District Court, District of New Jersey, the United States District and Bankruptcy Courts, Southern District of New York, the United States District and Bankruptcy Courts Eastern District of New York and the United States Circuit Court of Appeals for the 3rd and 8th Circuits.

5. I am in good standing in each of these jurisdictions.

6. There are no grievances pending against me and I have never been reprimanded, suspended, placed on inactive service, disbarred, or resigned from the practice of law, nor have I been denied the privilege to practice before any court. I have never been charged, arrested, or convicted of any crime of fraud or moral turpitude.

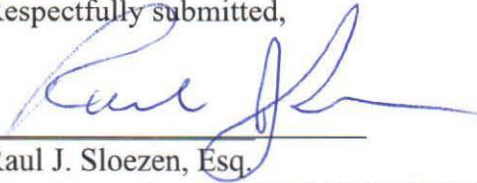
7. I have not been denied admission to the courts of any State or any federal court during the preceding five years.

8. I have read and will comply with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the Bar and will at all times abide by and comply with the same so long as such Texas proceeding is pending and he has not withdrawn as counsel therein.

9. Attached is a copy of the Acknowledgement Letter dated March 14, 2023, from the Board of Law Examiners confirming that I paid the Non-Resident Attorney Fee.

WHEREFORE, Raul J. Sloezen respectfully requests that this Court issue an order declaring that Raul J. Sloezen is qualified to serve as co-counsel and is admitted *pro hac vice* in this action on behalf of Pegasus Fund, LLC.

Respectfully submitted,



Raul J. Sloezen, Esq.
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New York Attorney ID #2613438
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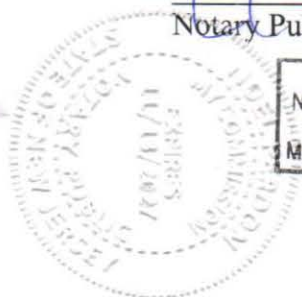
**ATTORNEYS FOR DEFENDANT
PEGASUS FUND, LLC**

Sworn and subscribed to before me
This 14 day of March, 2023



Notary Public

NOEL PERDON
Notary Public, State of New Jersey
Comm. # 50071246
My Commission Expires 11/13/2027



CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing instrument has been served via e-filing Notification of Service on all known counsel of record and/or by Electronic Mail, First Class Mail, or Certified Mail Return Receipt Requested on the 14th day of March, 2023:

/s/ Joshua R. Thane
Joshua R. Thane

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Joshua Thane

Bar No. 24060713

jthane@haltomdoan.com

Envelope ID: 73653520

Filing Code Description: Motion (No Fee)

Filing Description: Motion for Admission Pro Hac Vice of Raul J. Sloezen

Status as of 3/14/2023 3:15 PM CST

Case Contacts

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