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9 Of Counsel; **Larry Klayman, Esq.**
10 Chairman and General Counsel
11 Freedom Watch, Inc.

12 Attorneys for the Plaintiff

13
14 **IN THE UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**
16 **WESTERN DIVISION**

17 Jacqueline Williams in the Right of)
18 and for the Benefit of American)
19 International Group and herself and)
20 other Shareholders of the Class)
21 Plaintiffs,)
22 v.)
23 EDWARD M. LIDDY, et al.)
24 Defendants.)
25 _____)

CASE NO: 2:09-cv-2108 AHM-RCx
**MOTION TO MAKE SPECIAL
APPEARANCE**
Hearing Date: June 8, 2009
Time: 10:00 a.m.
Courtroom: 14
Hon. A. Howard Matz

26 Plaintiff's outside counsel and general counsel of Freedom Watch, Larry Klayman, moves
27 this honorable court to make a special appearance at the above styled hearing on Defendants'
28 motion to transfer and as grounds therefore would show:

1. Larry Klayman is licensed to practice in the District of Colombia, Florida and
Pennsylvania and has appeared before this court in the past pro hac vice. He has at all times in

1 his 33 years of practice been a member in good standing of these state bars and has not been
2 disciplined by any of them (Exhibit 1).

3
4 2. When this lawsuit was filed, Freedom Watch, the non-profit foundation which filed the
5 suit for the Plaintiff, had in its employ a California local counsel, Abe Luca, Esq., who was going
6 to move Larry Klayman in to this case pro hac vice, but he left Freedom Watch's employ for
7 other employment.

8
9 3. Freedom Watch has been looking for other local counsel, but because of the political
10 aspect of this case – which joins the Treasury Secretary and others – in addition to AIG and is
11 directors, local Los Angeles lawyers are reticent to take on these big political interests. Freedom
12 Watch has located one that is likely willing, but the group is still in negotiation with him.

13
14 4. Thus, Larry Klayman respectfully requests leave of this court to appear specially, at this
15 time just to argue against transfer orally, at the above styled hearing and will, once local counsel
16 is signed, support him for entry pro hac vice if Defendants do not consent (Exhibit 2).

17
18 5. This motion is within the discretion of this court to grant and the Defendants' counsel,
19 having been contacted, have yet to return the undersigned's call.

20
21 Respectfully submitted,

22 DATED: June 05, 2009

23 By /s/ Larry Klayman
24 Larry Klayman, Esq.
25 Chairman
26 Freedom Watch, Inc.
27 9701 Wilshire Blvd. Suite 900
28 Beverly Hills, CA 90212