

EXHIBIT "2"

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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 In the matter of

18 Jacqueline Williams in the Right of)
19 and for the Benefit of American)
20 International Group and herself and)
21 other Shareholders Of the Class)

22 Plaintiffs,)

23 v.)

24 EDWARD M. LIDDY, et al.)

25 Defendants.)

CASE NO: 2:09-cv-2108 AHM-RCx

**APPLICATION OF LARRY
KLAYMAN FOR ADMISSION
PRO HAC VICE**

Hearing Date: June 8, 2009

Time: 10:00 a.m.

Courtroom: 14

Hon. A. Howard Matz

26 TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

27 PLEASE TAKE NOTICE that at the above time and place, the undersigned will apply for
28 permission to appear as counsel *pro hac vice* before the United States District Court in the
Central District of California in this matter. I, Larry Klayman, certifies that:

1 1. I am admitted to the following Supreme courts: Florida , the District of Columbia,
2 and Pennsylvania.

3 2. I am currently in good standing in the above-mentioned courts (*see attachment A*)
4 and I have never been subject to discipline in any of the courts to which I have been admitted.
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6 3. I recently moved to California and am scheduled to take the California bar exam
7 in July, 2009.

8 4. My contact information is the following:

9 (b) Business address: Freedom Watch, Inc. 9701 Wilshire Blvd., Beverly
10 Hills, CA 90212, Tel: (310) 651-3026, Fax: (310)-651-3025
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12 5. I am not currently *pro hac vice* with this court.

13 6. In the case of Baldwin Hardware v. Frank Su Enterprises (93-cv-1185), Judge
14 William D. Keller instructed me to attach a copy of his order, which I no longer have in my
15 possession, concerning sanctions which I maintain were unfairly meted out. A review of this
16 order by Bar Associations confirms that I did nothing wrong. According to my recollection, this
17 order was issued over 15 years ago.
18

19 7. The current attorney of record in this case is:

20 Abe Luca, Esq. (235953), tel: (805) 300-4068
21 26500 Agoura Rd #102-853, Calabasas, CA 91302
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23 8. My role in the above mentioned litigation will be to become the attorney of record
24 for the Plaintiffs.

25 I declare under penalty of perjury under the laws of the State of California that the
26 forgoing is true and correct.
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Respectfully submitted,

DATED: June 05, 2009

By /s/ Larry Klayman
Larry Klayman, Esq.
Chairman
Freedom Watch, Inc.
9701 Wilshire Blvd. Suite 900
Beverly Hills, CA 90212