IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

ERIC GREATHOUSE, individually and on behalf of all others similarly situated, **Plaintiff,** **v.** **CAPITAL PLUS FINANCIAL, LLC and CROSSROADS SYSTEMS, INC.,** **Defendants.**	**Case No. 4:21-cv-01243-BRW**

MOTION FOR LEAVE TO APPEAR PRO HAC VICE

Pursuant to Local Rule 83.5(d), Plaintiff Eric Greathouse ("**Greathouse**"), individually and on behalf of all others similarly situated, moves this Court for the admission of Justin A. Heller ("**Heller**") of the law firm Nolan Heller Kauffman LLP, to appear as an additional attorney of record for and on behalf of Greathouse *pro hac vice*. In support of said motion, Greathouse states as follows:

1. The undersigned is a member in good standing of the bar of the State of Arkansas and of the United States District Court for the Eastern District of Arkansas. She maintains an office located in Arkansas for the practice of law at 3350 S. Pinnacle Hills Parkway, Suite 301, Rogers, AR 72758. The court and opposing counsel may readily communicate with the undersigned regarding the conduct of the case.

2. Heller's office address, e-mail address and telephone number are:

Nolan Heller & Kauffman LLP
80 State Street, 11th Floor
Albany, NY 12207
Office: 518-449-3300
jheller@nhkllp.com

3. Heller is admitted to, and a member in good standing of, the bar of the State of New York (2012).

4. Heller does not reside in Arkansas, is not regularly employed in Arkansas, and is not regularly engaged in the practice of law in Arkansas. Heller agrees to follow the Local Rules of the Court and to submit to the jurisdiction of the Court in matters of discipline.

WHEREFORE, Greathouse respectfully requests that this Court enter an order allowing Justin A. Heller to appear before the Court *pro hac vice* as an additional attorney of record on behalf of Greathouse in the above-captioned case.

Respectfully submitted,

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