STATE OF NEW YORK SUPREME COURT COUNTY OF NEW YORK

In the Matter of a Proceeding under Article 70 of the CPLR

In the Matter of a Proceeding under Article 70 of the CPLR for a Writ of Habeas Corpus,

THE NONHUMAN RIGHTS PROJECT, INC., on behalf of KIKO,

Petitioner,

-against-

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

Index No.:

CARMEN PRESTI, individually and as an officer and director of The Primate Sanctuary, Inc., CHRISTIE E. PRESTI, individually and as an officer and director of The Primate Sanctuary, Inc., and THE PRIMATE SANCTUARY INC.,

Respondents.	
	X

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Steven M. Wise, Esq., dated December 21, 2015, his Certificate of Admission of Good Standing, the Affidavit of Elizabeth Stein, Esq. in support of Attorney Wise's admission *pro hac vice* and all other papers annexed thereto, the undersigned moves this Court to admit Steven M. Wise, Esq. *pro hac vice* to brief and argue the above-captioned action. Attorney Wise is highly qualified and competent in the matters of this case and his assistance is necessary, as set forth in his attached Affidavit. He has been admitted *pro hac vice* in the same case brought in the New York Supreme Court, Niagara County and on appeal to the Supreme Court of the State of New York Appellate Division, Fourth Judicial Department as well as in near-identical cases brought in the New York Supreme Court Counties of New York and Fulton, the Supreme Court of the State of New York Appellate Division, Third Judicial Department, and the Court of Appeals in the cases brought on appeal from the decisions of the Third and Fourth Departments. The undersigned is a member in good standing of the New York Bar, shall be the attorney of record in this

case and shall appear with Attorney Wise on the matter and shall be the person upon whom all papers in connection with the cause shall be served.

PLEASE TAKE FURTHER NOTICE, that the motion is returnable at 9:30 A.M. on Wednesday, January 20, 2016, at the Courthouse located at 60 Centre Street, New York, New York 10007, in the Motion Submission Part Courtroom (Room 130). The Respondents are hereby given notice that the motion will be submitted on the papers and their personal appearance in opposition is neither required nor permitted.

Dated: | | 6 | 16

Elizabeth Stein, Esq. Attorney for Petitioner

5 Dunhill Road

New Hyde Park, New York 11040

(516) 747-4726

TO:

Carmen Presti, individually and as an officer and director of The Primate Sanctuary, Inc. 2764 Livingston Avenue
Niagara Falls, New York 14303
716-284-6118

Christie E. Presti, individually and as an officer and director of The Primate Sanctuary, Inc. 2764 Livingston Avenue
Niagara Falls, New York 14303
716-284-6118

The Primate Sanctuary, Inc. 2764 Livingston Avenue Niagara Falls, New York 14303 716-284-6118