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FILED Jul 26, 2013

GREENBERG TRAURIG LLP
200 Park Avenue
Florham Park, NJ 07932
(973) 360-7900
Attorneys for Beneficial Financial I, Inc., *et al.*

IN RE APPLICATION BY BENEFICIAL FINANCIAL I, INC., ET AL., TO ISSUE CORRECTED NOTICES OF INTENT TO FORECLOSE ON BEHALF OF IDENTIFIED FORECLOSURE PLAINTIFFS	**SUPERIOR COURT OF NEW JERSEY** **CHANCERY DIVISION** **MERCER COUNTY** **DOCKET NO.: F-015390-13** **CIVIL ACTION** **NOTICE OF MOTION FOR *PRO HAC VICE* ADMISSION OF D. BRIAN O'DELL, ESQ.**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that on August 9, 2013, or on such date as the Court may direct, Beneficial Financial I, Inc., Beneficial Mortgage Corporation, Household Finance Corporation III, and HSBC Mortgage Services, Inc. (collectively, "HSBC"), shall move before the Honorable Paul Innes P.J.Ch., at the Superior Court of New Jersey, Mercer County, Trenton, New Jersey, for entry of an Order pursuant to R. 1:21-2 admitting attorney D. Brian O'Dell, of the law firm of Bradley Arant Boult Cummings LLP, to practice law *pro hac vice for the purposes of this litigation*; and

PLEASE TAKE FURTHER NOTICE that in support of this application, HSBC will rely upon the Certifications of D. Brian O'Dell, Esq., and Ian Marx, Esq., filed concurrently herewith; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith; and

PLEASE TAKE FURTHER NOTICE that pursuant to R. 1:6-2(d), HSBC requests oral argument if this application is contested in a timely manner.

GREENBERG TRAURIG LLP
Attorneys for Beneficial Financial I, Inc., *et al.*

By: _____
Ian S. Marx

Date: July 23, 2013

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