IN THE SUPREME COURT OF FLORIDA

CASE NO.: SC15-1655

PLANNED PARENTHOOD OF GREATER ORLANDO, INC., n/k/a PLANNED PARENTHOOD OF SOUTHWEST AND CENTRAL FLORIDA, INC., a Florida non-profit corporation,

Petitioner,

v.

MMB PROPERTIES, a Florida general partnership,

Respondent.

_____/

VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE* PURSUANT TO FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510

Comes now, Helene T. Krasnoff, Movant herein, and respectfully represents the following:

1. Movant resides in Chevy Chase, Maryland. Movant is not a resident of the State of Florida.

2. Movant is an attorney and a member of the Public Policy Litigation and Law department of Planned Parenthood Federation of America, with offices at 1110 Vermont Avenue NW, Suite 300, Washington, DC 20005, Telephone No. 202.973.4800.

3. Movant has been retained personally or as a member of the above named law firm on June 9, 2014 by Petitioner Planned Parenthood of Greater Orlando, Inc. n/k/a Planned Parenthood of Southwest and Central Florida, Inc. to provide legal representation in connection with the above-styled matter now pending before the above-named court of the State of Florida.

4. Movant is an active member in good standing and currently eligible to practice law in the District of Columbia (Bar Number 460177) and the State of New York (Registration Number 2876001), and is eligible to practice law in the United States District Court for the District of Columbia; the United States Courts of Appeals for the Fourth, Fifth, Sixth, Eighth, Ninth, and Tenth Circuits; and the United States Supreme Court.

5. There have been no disciplinary, suspension, disbarment, or contempt proceedings initiated against Movant in the preceding 5 years.

6. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

7. Movant is not an inactive member of The Florida Bar.

8. Movant is not now a member of The Florida Bar.

9. Movant is not a suspended member of The Florida Bar.

10. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

11. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

12. Movant has not filed motion(s) to appear as counsel in Florida state courts during the past five (5) years.

13. Local counsel of record associated with Movant in this matter are Donald E. Christopher, Esq., Florida Bar Number 250831, and Kyle A. Diamantas, Esq., Florida Bar Number 106916, who are active members in good standing of The Florida Bar and have offices at 200 South Orange Avenue, Suite 2900, Orlando, FL 32801; (407) 422-6600.

14. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

15. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

DATED December 10, 2015.

Helene T. Krasnoff
Planned Parenthood Federation of America
1110 Vermont Avenue NW
Suite 300
Washington, DC 20005
Telephone Number: 202.973.4800
Email Address: helene.krasnoff@ppfa.org

WASHINGTON, DISTRICT OF COLUMBIA

I, Helene T. Krasnoff, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

Movant

The foregoing instrument was acknowledged before me this 10th day of December, 2015, by HELENE T. KRASNOFF, who is personally known ~~to~~ me.

(signature)

Tshombe A. Hubbard (printed name)
Notary Public

My Commission Expires: 7/14/2020

TSHOMBE A. HUBBARD NOTARY PUBLIC DISTRICT OF COLUMBIA Exp. 07/14/2020

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

DATED December 10, 2015.

Donald E. Christopher
Florida Bar No.: 250831
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
SunTrust Center
200 South Orange Avenue, Suite 2900, Orlando, Florida 32801
Telephone: (407) 422-6600
Email: DChristopher@bakerdonelson.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by mail to PHV Admissions, The Florida Bar, 651 East Jefferson Street, Tallahassee, Florida 32399-2333 accompanied by payment of the $250.00 filing fee made payable to The Florida Bar, or notice that the movant has requested a judicial waiver of said fee; and by email to:

Dennis R. O'Connor, Esq.
O'Connor & O'Connor, LLC
840 S. Denning Drive, Suite 200
Winter Park, FL 32789
doconnor@oconlaw.com

Maureen A. Arago, Esq.
The Arago Law Office
P.O. Box 452275
Kissimmee, FL 34745-2275
maureenarago@aragolaw.com

this 11th day of December, 2015.

Movant