

**IN THE SUPREME COURT OF THE VIRGIN ISLANDS**

**IN THE MATTER OF THE APPLICATION FOR  
THE *PRO HAC VICE* ADMISSION**

**S. Ct. BA No. 2015-358**

**OF: LINDA SINGER**

**PETITION FOR ADMISSION *PRO HAC VICE* OF LINDA SINGER**

Comes now Joel H. Holt, who is an active member of the Virgin Islands Bar in good standing, and hereby respectfully move for the admission of LINDA SINGER in accordance with Virgin Islands Supreme Court Rule 201. In support of this petition, it is respectfully submitted as follows:

1. Joel H. Holt has been retained by the Government of the Virgin Islands to prosecute a complaint against Hess Corporation and its related companies and officers in the Superior Court of the Virgin Islands.
2. Linda Singer, a member of the Washington, D.C. office of Cohen Milstein Sellers and Toll PLLC, has also been requested by the Government of the Virgin Islands to represent its interests, along with the undersigned counsel, in the litigation filed against Hess Corporation in the Superior Court of the Virgin Islands, Civil No. 15-358. The complaint involves alleged damages related to the premature cancellation of the 1965 HOVIC Tax Concession Agreement with the Government and the various Amendments thereof.
3. Linda Singer is a specialist in this type of complex litigation, which includes multiple claims such as contract, tort, environmental and related claims involving multiple international corporations, who has been retained by the Government for

her services for this specialized purpose, which is expressly subject to the approval of this petition.

4. Joel H. Holt has been retained as local counsel for the Government in this planned litigation and has personally met with Linda Singer before filing this motion.
5. Attached as **Exhibit A** is the affidavit of Joel H. Holt as required by the rules of this Court, which is submitted in support of this motion. As noted therein, it is respectfully submitted that Linda Singer is a person of good moral character and high professional standing and possesses all of the qualifications required to practice law in the U.S. Virgin Islands.
6. Linda Singer has completed the required "*Pro Hac Vice* Application" that is attached hereto as **Exhibit B** in furtherance of this Petition, in accordance with the Rules of the Supreme Court of the Virgin Islands.
7. As stated in the attached Application, Attorney Singer has never been the subject of any disbarment or suspension in any jurisdiction.
8. In accordance with Superior Court Rule 201(a)(4), all bar membership fees have been paid, including \$300 in dues to the Virgin Islands Bar Association, as evidenced by the receipt attached hereto as part of **Group Exhibit C**.
9. Linda Singer has never been admitted *pro hac vice* in the Virgin Islands. See **Exhibit B**.<sup>1</sup>

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<sup>1</sup> Another Lawyer at Cohen Milstein Sellers & Toll, Kenneth Rehns, was previously admitted *Pro Hac Vice*, in *Fayun Luo v. Qiao Xing Universal Resources, et al.*, No. 12-cv-00045-WAL-GWC in 2012.

10. As such, it is respectfully requested that Linda Singer be admitted *pro hac vice* to help prosecute this planned litigation. A proposed Order granting *pro hac vice* admission is being submitted with this petition.

WHEREFORE, Joel H. Holt, respectfully requests that this Honorable Court approve the *pro hac vice* admission of Linda Singer.

Dated: September 14, 2015

/s/ Joel H. Holt  
**Joel H. Holt, Esq.**(Bar No. 6)  
Law Offices of Joel H. Holt  
2132 Company Street  
Christiansted, St. Croix  
USVI, 00820  
Telephone: (340) 773-8709  
Email: holtvi@aol.com

IN THE SUPREME COURT OF THE VIRGIN ISLANDS

IN THE MATTER OF THE APPLICATION FOR  
THE *PRO HAC VICE* ADMISSION

OF: LINDA SINGER,

S. Ct. BA No. 2015-\_\_\_\_\_

RE: CIV. NO. SX-2015-CV- 358

**AFFIDAVIT JOEL H. HOLT IN SUPPORT OF  
MOTION FOR ADMISSION *PRO HAC VICE***

I, Joel Holt, Esq., being duly sworn hereby state as follows:

1. I am an adult resident of St. Croix and am familiar with the facts asserted herein.
2. I am an attorney currently in good standing and an active member of the Virgin Islands Bar Association.
3. The Government has retained me to be local counsel of record. This case involves alleged damages related to the premature cancellation of the 1965 HOVIC Tax Concession Agreement with the Government and the subsequent amendments thereof.
4. I have filed a petition for the admission of Linda Singer, Esq. *pro hac vice* before this Court and submit this affidavit in support of this petition.
5. Linda Singer is a lawyer practicing in the Washington, D.C. office of Cohen Milstein Sellers & Toll, PLLC. She has been requested by the Government of the Virgin Islands ("Government") to represent its interests, along with myself, in the litigation filed against Hess Corporation in the Superior Court of the Virgin Islands, Civil No. 15-368
6. Linda Singer is a specialist in this type of complex litigation, which includes multiple claims such as contract, tort, environmental and related claims

involving multiple international corporations, who has been retained by the Government for her services for this specialized purpose, which is expressly subject to the approval of this petition.

7. I personally met with Linda Singer in Washington, D.C., on August 19, 2015, before filing this motion, and I find her to be a person of good moral character and high professional standing, who possesses all of the qualifications required to practice law in the U.S. Virgin Islands.
8. Linda Singer has not been previously been admitted *pro hac vice* in any case in this jurisdiction.<sup>1</sup>
9. This case involves unique legal issues for the Government which requires the type of expertise and experience that Linda Singer has.
10. For the foregoing reasons and for reasons set forth in the affidavit of Linda Singer and her *pro hac vice* questionnaire, I respectfully request her admission be permitted.

Dated: September 11<sup>th</sup>, 2015

  
\_\_\_\_\_  
Joel H. Holt

SUBSCRIBED AND SWORN TO  
before me this 11<sup>th</sup> day of September, 2015

  
\_\_\_\_\_  
NOTARY PUBLIC

Susan C. Nissman  
Notary Public # NP-70-15  
My Commission Expires:  
July 18, 2019

<sup>1</sup> Another Lawyer at Cohen Milstein Sellers & Toll, Kenneth Rehns, was previously admitted Pro Hac Vice, in *Fayun Luo v. Qiao Xing Universal Resources, et al.*, No. 12-cv-00045-WAL-GWC.



(b) Have you ever been disbarred or suspended, from practicing law in any jurisdiction(s)?

Yes  No

(c) If yes, list the jurisdiction (s):

\_\_\_\_\_  
\_\_\_\_\_

**PRIOR ADMISSION INFORMATION**

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6. (a) Have you ever been denied full or pro hac vice admission in any jurisdiction?

Yes  No

(b) If yes, list the jurisdiction (s):

\_\_\_\_\_  
\_\_\_\_\_

7. (a) Have you ever been admitted pro hac vice in any previous matter(s) before the Supreme Court of the Virgin Islands, Superior Court of the Virgin Islands (formerly the Territorial Court of the Virgin Islands), or the District Court? \*

Yes  No

(b) If yes, list previous cases by caption and case number, covering the last five years in which you participated. Also list the admission date(s), the case filing dates and Court: (Please list cases chronologically. Use an extra page if necessary.)

Case Caption (1): N/A

Case No.: \_\_\_\_\_

Pro Hac Vice Admission Date: \_\_\_\_\_

Case filing date: \_\_\_\_\_

Name of Court in which appearance was made: \_\_\_\_\_

Case Caption (2): N/A

Case No.: \_\_\_\_\_

Pro Hac Vice Admission Date: \_\_\_\_\_

Case filing date: \_\_\_\_\_

Name of Court in which appearance was made: \_\_\_\_\_

Case Caption (3): N/A

Case No.: \_\_\_\_\_

Pro Hac Vice Admission Date: \_\_\_\_\_

Case filing date: \_\_\_\_\_

Name of Court in which appearance was made: \_\_\_\_\_

\*Another Lawyer at Cohen Milstein Sellers & Toll, Kenneth Rehns, was previously admitted Pro Hac Vice, in Fayun Luo v. Qiao Xing Universal Resources, et al., No. 12-cv-00045-WAL-GWC.

8. Did your participation include your presence in the U.S. Virgin Islands?

Yes  No

**MEMBERSHIP DUES/LICENSING FEES**

9. Have you, the attorney seeking pro hac vice admissions, paid the Virgin Islands bar dues and/or licensing fees pursuant to Supreme Court Rule 201 (a) (4)? (Please attach receipt issued from the VI Bar Association.)

Yes  No

10. With respect to any income earned from the Supreme Court of the Virgin Islands and/or District Court of the Virgin Islands cases, have you filed all necessary reports with and paid all income and gross receipt taxes to the Virgin Islands Bureau of Internal Revenue?

Yes  No  Not Applicable

11. If not, state the reason for such non-compliance:

\_\_\_\_\_  
\_\_\_\_\_

**ACKNOWLEDGEMENT AND SIGNATURE**

I acknowledge by this application that the Supreme Court, and its representatives, may make further inquiry with any governmental or private entity or individual concerning myself, in the furtherance of this application and I hereby consent to said disclosures.

Further, I acknowledge that I have attached to this questionnaire, all Certificates of Good Standing, evidencing my bar membership in all jurisdictions admitted, receipts evidencing the full payment of all bar membership fees to the Virgin Islands Bar Association and the Virgin Islands Department of Licensing and Consumer Affairs in accordance with Supreme Court Rule 201 (a) (4).

Finally, I acknowledge that copies have been forwarded to all counsel.

Dated: 8/21/15

  
\_\_\_\_\_  
(Attorney's signature who is seeking Pro Hac Vice Admission)

**NOTARY SIGNATURE AND SEAL**

Subscribed and sworn to before me this 21<sup>st</sup> day of August 2015

  
\_\_\_\_\_  
(NOTARY PUBLIC)

My Commission expires:



**DEBORAH VANZEGO**  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires January 1, 2019



VIRGIN ISLANDS BAR ASSOC  
P.O. Box 224108  
Christiansted, VI 00822-4108  
(340) 778-7497

# RECEIPT

DATE 9/14/15 NO. 077529

RECEIVED FROM Joel Holt, cog

ADDRESS \_\_\_\_\_

Three Hundred Dollars \$ 300.00

FOR Pro Hac Admission of Linda Singer, Esq

ACCOUNT		HOW PAID	
AMT. OF ACCOUNT		CASH	
AMT. PAID	<u>300 00</u>	CHECK	
BALANCE DUE	<u>00</u>	MONEY ORDER	

2016-0358

BY [Signature]

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Blumberg No. 5208  
EXHIBIT  
C



**Appellate Division of the Supreme Court  
of the State of New York  
Second Judicial Department**

I, **Aprilanne Agostino**, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **Linda Jill Singer** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the 29<sup>th</sup> day of **April 1992**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on August 20, 2015.



*Aprilanne Agostino*

Clerk of the Court



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710


*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

***LINDA J. SINGER***

*was on **JANUARY 8, 2007** duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on **August 24, 2015**.*

JULIO A. CASTILLO  
Clerk of the Court

By:   
Deputy Clerk