

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sanjiv Kakkar v. Christopher Chestnut, et al.

Kakkar v. Chestnut · No. 1:25-cv-01627-JLT-SAB-HC · Decided December 16, 2025

SUMMARY

The United States District Court for the Eastern District of California ordered attorney Christine Raymond to show cause why her application for admission to practice pro hac vice should not be denied. The court questioned whether her residence, employment, and professional activities in California complied with Local Rule 180(b)(2), and allowed seven days for a written response.

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF
CALIFORNIA 10 11 SANJIV KAKKAR, Case No. 1:25-cv-01627-JLT-SAB-HC 12 Petitioner,
ORDER REQUIRING CHRISTINE RAYMOND TO SHOW CAUSE WHY PRO 13 v. HAC
VICE APPLICATION SHOULD NOT BE DENIED 14 CHRISTOPHER CHESTNUT, et al.,
(ECF No. 9) 15 Respondents. 16 17 The Court has read and considered the application of
Christine Raymond, attorney for 18 Petitioner, for admission to practice pro hac vice under the
provisions of Rule 180(b)(2) of the 19 Local Rules of Practice of the United States District Court
for this District (“Local Rules” or 20 “L.R.”).

(ECF No. 9.) 21 Local Rule 180 provides in pertinent part: 22 Attorneys Pro Hac Vice. An
attorney who is a member in good standing of, and eligible to practice before, the Bar of any
United States Court or of the highest 23 Court of any State, or of any Territory or Insular
Possession of the United States, and who has been retained to appear in this Court may, upon
application and in 24 the discretion of the Court, be permitted to appear and participate in a
particular case.

Unless authorized by the Constitution of the United States or an Act of 25 Congress, an attorney is
not eligible to practice pursuant to (b)(2) if any one or more of the following apply: (i) the
attorney resides in California, (ii) the attorney 26 is regularly employed in California, or (iii) the
attorney is regularly engaged in professional activities in California.

27 L.R. 180(b)(2). 1 The Supreme Court has described pro hac vice attorneys as one time or
occasional 2 | practitioners. *Frazier v. Heebe*, 482 U.S. 641, 647 (1987). The right to appear pro
hac vice is not 3 | absolute and a court may deny the application by setting forth reasons for the
denial. *United 4 | States v. Ries*, 100 F.3d 1469, 1471-72 (9th Cir. 1996).

In addressing whether an attorney has 5 | been regularly practicing in California, the Ninth Circuit considered whether the attorney 6 | physically appeared before the district court, signed pleadings, and had contact with the 7 | plaintiffs, whether an attorney licensed in California remained the sole attorney responsible to 8 | the plaintiff, and whether the attorney rendered legal advice to the client.

Winterrowd v. Am. 9 | Gen. Annuity Ins. Co., 556 F.3d 815, 825 (9th Cir. 2009). 10 Ms. Raymond lists four other cases in which she has made an application to be admitted 11 | to practice pro hac vice in this District in the past year: Phong Phan v. Becerra, No. 2:25-cv- 12 | 01757-DC-JDP (application granted June 26, 2025); Quoc Hoac v. Becerra, 2:25-cv-01740-DC- 13 | JDP (application granted June 26, 2025); Yang v. Kaiser, 2:25-cv-02205-DAD-AC (application 14 | granted August 8, 2025); Zheng v. Albarran, 1:25-cv-01685-DJC-CKD (application granted 15 | December 2, 2025).

The application states that Ms. Raymond resides in San Francisco, 16 | California, and her law firm is located in San Francisco, which suggests regular employment in 17 | California and regular engagement in professional activities in California. 18 Accordingly, IT IS HEREBY ORDERED that within SEVEN (7) days of the date of 19 | service of this order, Christine Raymond SHALL SHOW CAUSE in writing why her pro hac 20 | vice application should not be denied for failure to comply with Local Rule 180(b)(2).

21 IT IS SO ORDERED. F- 2 Se 23 | Dated: _December 16, 2025 _ ef STANLEY A. BOONE 24
United States Magistrate Judge 25 26 27 28