

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 CHRISTOPHER MICHAEL ALBERTS)
)
 Defendant.)
_____)

Case No. 21-CR-026 (CRC)

MOTION FOR ADMISSION PRO HAC VICE

Allen H. Orenberg, counsel for Defendant CHRISTOPHER MICHAEL ALBERTS, (hereinafter, “Defendant” or “Mr. Alberts”), respectfully moves the Court for the entry of an Order permitting Attorney Kenneth W. Ferguson to appear *pro hac vice* in accordance with LCrR 44.1(d). For the Court’s consideration and in support thereof, an accompanying Declaration along with a proposed Order has been submitted for the Court’s consideration.

1. Kenneth W. Ferguson and his firm have been retained by the Defendant for representation in the above-captioned case.
2. Mr. Ferguson has been in regular communication with the Defendant throughout the time period that the case has been pending.
3. Mr. Ferguson has completed a declaration required by Local Criminal

Rule LCr44.1(d), which is attached to this motion as **Exhibit A**.

4. This case is not a related or consolidated matter for which Mr. Ferguson has previously applied to appear *pro hac vice*.

5. The office address of Mr. Ferguson is: Ferguson Law, P.A., 1 East Broward Blvd. Suite #700, Fort Lauderdale, Florida 33301.

6. Mr. Ferguson regularly practices in federal court and is familiar with the United States Code pertaining to the jurisdiction of and practice in the United States District Courts; the federal rules of criminal and civil procedure, and the United States Sentencing Guidelines.

7. Mr. Ferguson indicates that he has reviewed the Local Rules of this Court, and will faithfully adhere to same.

WHEREFORE, having complied with the requirements of this Court's Local Rules concerning the appearance of counsel who are not members of this Court, and based upon Mr. Ferguson's experience and credentials outlined above, it is respectfully requested that this Court grant this motion and admit Mr. Ferguson *pro hac vice* to appear and be heard, with or without the presence of local counsel, as Defendant's counsel in this case. Furthermore, it is respectfully requested that Mr. Ferguson be permitted to execute all pleadings in this case without the necessity of undersigned counsel being required to also execute all pleadings in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2022, I filed the foregoing Motion For Admission Pro Hac Vice, with a proposed Order and a Declaration by the Court's CM/ECF system. All case registered parties will be served by CM/ECF.

Allen H. Orenberg