

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

-v-

CHRISTOPHER WORRELL,

Defendant.

Case No. 21-MJ-00296 (GMH)

**MOTION FOR ADMISSION *PRO HAC VICE* OF JOHN M. PIERCE**

Pursuant to Local Civil Rule 83.2(d), Robert L. Jenkins, Jr., a member of the bar of this Court and counsel for Defendant, hereby moves for the admission *pro hac vice* of John M. Pierce in the above-captioned case. In support of this motion, the undersigned states as follows:

1. I am a member in good standing of the Bar of this Court.
2. John M. Pierce is an attorney with Pierce Bainbridge P.C. and maintains his office at 355 S. Grand Avenue, 44th Floor, Los Angeles, CA 90071.
3. As set forth in the attached declaration, John M. Pierce is an active member in good standing of the state bar of California (250443).
4. John M. Pierce does not wish to be admitted generally, but for the purposes of this case only.

WHEREFORE, movant respectfully requests that the Court enter an order permitting John M. Pierce to appear *pro hac vice* in the above-captioned case.

Dated: March 18, 2021

/s/ Robert L. Jenkins, Jr.  
Robert L. Jenkins Jr.  
U.S. District Court Bar No.: CO0003  
Brynum & Jenkins  
1010 Cameron Street, Ste. 123  
Alexandria, Va 22314  
Tel: (703) 309-0899  
[rjenkins@bynumandjenkinslaw.com](mailto:rjenkins@bynumandjenkinslaw.com)

Attorneys for Defendant Christopher  
Worrell

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 18, 2021, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ Robert L. Jenkins, Jr.  
Robert L. Jenkins Jr.

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**DECLARATION OF JOHN M.  
PIERCE IN SUPPORT FOR  
ADMISSION TO PRACTICE  
*PRO HAC VICE***

I, John M. Pierce, hereby certify under penalty of perjury that the following is true and correct:

1. I am the Managing Partner with the law firm Pierce Bainbridge P.C., located 355 Grand Avenue, 44th Floor, Los Angeles, CA 90071.

2. I am an active member in good standing of the state bar of California (SBN 250443).

3. I am a member in good standing of all the jurisdictions in which I am admitted to practice.


4. I have never been disciplined by any court, and no disciplinary proceedings are pending against me.

5. During the past two years, other than this matter, I have applied for admission *pro hac vice* in this Court. I applied for *pro hac vice* in *Page v. Comey, et al*, Case No. 20-cv-03460 (KBJ). That application was granted on January 7, 2021.

6. I am familiar with the Local Rules of this Court, the provisions of the Judicial Code (Title 25 U.S.C.) which pertains to the jurisdiction of and practice in the United States District Courts, the Federal Rules of Civil Procedure, the Federal

Rules of Evidence, the Rules of Professional Conduct as adopted by the District of Columbia Court of Appeals, and the D.C. Bar Voluntary Standards for Civility in Professional Conduct.

Dated: March 18, 2021

  
\_\_\_\_\_  
John M. Pierce  
**PIERCE BAINBRIDGE P.C.**  
355 Grand Street, 44th Floor  
Los Angeles, CA 90071  
tel: (213) 262-9333

**UNITED STATES DISTRICT COURT  
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**[PROPOSED] ORDER**

Upon consideration of Defendant's Motion for Admission *Pro Hac Vice* of John M. Pierce, it is hereby ORDERED that the Motion is GRANTED. John M. Pierce is admitted *pro hac vice* and may appear on behalf of Defendant Christopher Worrell in the above-captioned matter.

Dated: \_\_\_\_\_, 2021

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United States District Judge