

**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 JAMES F. KELLY

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 James F. Kelly 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. James F. Kelly is an attorney with Pierce Bainbridge P.C. He resides in Tulsa, Oklahoma where he practices law remotely.
3. As set forth in the attached declaration, James F. Kelly is an active member in good standing of the state bar of Oklahoma (16510).
4. James F. Kelly 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 James F. Kelly to appear *pro hac vice* in the above-captioned case.

Dated: April 5, 2021

/s/ Robert L. Jenkins, Jr.

Robert L. Jenkins Jr.
Bynum & Jenkins Law
U.S. District Court Bar No.: CO0003
1010 Cameron Street, Ste. 123
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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 JAMES
F. KELLY IN SUPPORT FOR
ADMISSION TO PRACTICE
*PRO HAC VICE***

I, James F. Kelly, hereby certify under penalty of perjury that the following is true and correct:

1. I am an associate with the law firm Pierce Bainbridge P.C., located 355 Grand Avenue, 44th Floor, Los Angeles, CA 90071. I resides in Tulsa, Oklahoma where I practices law remotely.

2. I am an active member in good standing of the state bar of Oklahoma (SBN 16510).

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

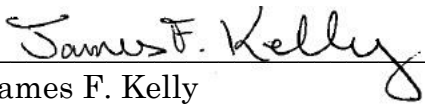
4. I have never been disciplined by any court, and no disciplinary proceedings are pending against me.

5. During the past two years, I have not applied for admission *pro hac vice* in this Court.

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: April 5, 2021


James F. Kelly
PIERCE BAINBRIDGE P.C.
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[PROPOSED] ORDER

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

Dated: _____, 2021

United States District Judge