

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

-v-

WILLIAM JOSEPH PEPE,

Defendant.

Case No. 21-CR-00052 (TKJ)-2

**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 25, 2021

/s/ Robert L. Jenkins, Jr.  
Robert L. Jenkins Jr., Esq.  
U.S. District Court Bar No.: CO0003  
Bynum & Jenkins Law  
1010 Cameron Street, Ste. 123  
Alexandria, Va 22314  
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*Attorneys for Defendant William Joseph Pepe*

**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, I have applied twice 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. The second case that I applied for *pro hac vice* is *United States v. Christopher Worrell*, Case No. 21-MJ-00296(GMH). That application was granted on March 22, 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 25, 2021

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

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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 William Joseph Pepe in the above-captioned matter.

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

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United States District Judge