

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	Case No. 21-CR-453 (JDB)
	)	
SEAN MICHAEL MCHUGH,	)	
	)	
Defendant.	)	
_____	)	

**MOTION FOR ADMISSION PRO HAC VICE**

Allen H. Orenberg, a member of this Court, hereby respectfully moves this Court for entry of an Order permitting Joseph William Allen to appear *pro hac vice* in accordance with LCrR 44.1(d). In support thereof, I hereby submit the accompanying Declaration, along with a proposed Order for the Court’s consideration.

1. Joseph W. Allen and his firm have been retained by the Defendant for representation in the above-captioned case.
2. Mr. Allen has been in regular communication with the Defendant throughout the time period that the case has been pending.
3. Mr. Allen has completed a declaration required by Local Criminal Rule LCr44.1(d), which is attached as an exhibit to this motion.
4. This case is not a related or consolidated matter for which Mr. Allen has previously applied to appear *pro hac vice*.
5. The office address of Mr. Allen is: 1015 State Highway 248 STE I, Branson, MO 65616

6. Mr. Allen regularly practices in the State Courts of Missouri and is licensed to, and has practiced and appeared before the Federal Court in his State, 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. Allen indicates that he has reviewed the Local Rules of this Court and will faithfully adhere to the rules.

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. Allen's experience and credentials outlined above, it is respectfully requested that this Court grant this motion and admit Mr. Allen *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. Allen 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 the 10<sup>th</sup> day of August, 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