

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

-v-

DAVID JOHN LESPERANCE, CASEY
CUSICK, and JAMES VARNELL
CUSICK, JR.,

Defendants

Criminal No. 1:21-cr-575 (JDB)

MOTION FOR ADMISSION *PRO HAC VICE* OF ROGER ROOTS

Pursuant to Local Civil Rule 83.2(d), John M. Pierce, a member of the bar of this Court and counsel for Defendant, hereby moves for the admission *pro hac vice* of Roger Roots 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. Roger Roots is an attorney licensed in Rhode Island, with an office located at 10 Dorrance Street Suite 700 #649, Providence, RI 02903. Mr. Roots resides in Livingston, Montana where he practices remotely.
3. As set forth in the attached declaration, Mr. Roots is an active member in good standing of the state bar of Rhode Island (SBN 6752).
4. Mr. Roots 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 Roger Roots to appear *pro hac vice* in the above-captioned case.

Dated: June 13, 2023

/s/ John M. Pierce _____

John M. Pierce

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on June 13, 2023, this motion and the accompany declaration was filed via the Court's electronic filing system, which constitutes service upon all counsel of record.

/s/ John M. Pierce
John M. Pierce