

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

UNITED STATES OF AMERICA,)	
)	
v.)	CASE NO. 21-CR-387
)	
)	
AUDREY SOUTHARD-RUMSEY,)	
Defendant.)	

**MOTION FOR CJA APPOINTMENT OF COUNSEL *PRO HAC VICE*
AND SUPPORTING AFFIDAVIT**

COMES NOW, Defendant Audrey Southard-Rumsey, via undersigned counsel, and moves this Court pursuant to 18 U.S.C. Sec. 3006A, and the Criminal Justice Act (CJA) Guidelines Section 210.30.30 for CJA appointment and admission *pro hac vice* in this matter and states as follows:

1. Counsel filed her Notice of Appearance June 16th, 2021 in the Middle District of Florida (Case No. 8:21-MJ-1534).
2. Counsel had been paid a total of \$6,000, with no further payments or monies received in over six months. (See attached Affidavit in Support of Motion for Appointment of Counsel (CJA)).
3. Counsel was admitted *pro hac vice* to the U.S. District Court for the District of Columbia and filed her Notice of Appearance *pro hac vice* on December 13th, 2021.
4. Counsel is not a CJA member.
5. The Criminal Justice Act (CJA) Guidelines Section 210.30.30 allows for appointment of counsel to CJA *pro hac vice* as follows:

§ 210.30.30 *Pro Hac Vice* Appointments

(a) If the district judge presiding over the case, or the chief judge if a district judge

has not yet been assigned to the case, determines that the appointment of an attorney, who is not a member of the CJA panel, is in the interest of justice, judicial economy or continuity of representation, or there is some other compelling circumstance warranting the attorney's appointment, the attorney may be admitted to the CJA panel *pro hac vice* and appointed to represent the CJA defendant.

(b) Consideration for preserving the integrity of the panel selection process suggests that *pro hac vice* appointments should be made only in exceptional circumstances.

(c) The attorney, who may or may not maintain an office in the district, should possess such qualities as would qualify the attorney for admission to the district's CJA panel in the ordinary course of panel selection.

6. This matter is set for trial January 19th, 2023.
7. An arraignment on the Government's Second Superseding Indictment was held on November 14th, 2022, wherein counsel informed the Court that exceptional circumstances exist, and counsel orally moved the Court for admission and appointment *pro hac vice* to CJA for purposes of being able to continue representing Defendant. The Government had no objection to counsel's requested relief, and the Court appointed.

WHEREFORE, Defendant requests this Honorable Court enter its Order granting this Motion for Appointment of Counsel (CJA) *Pro Hac Vice, nunc pro tunc* to November 14th, 2022.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for CJA Appointment of Counsel *Pro Hac Vice* and Supporting Affidavit has been furnished via Electronic Filing to Alexis Loeb, AUSA, Office of the U.S. Attorney, District of Columbia, alexis.loeb@usdoj.gov, Robert L. Jenkins, Jr., Esq., Rjenkins@BynumAndJenkinsLaw.com, 1010 Cameron St., Alexandria, VA 22314 on this 6th day of December, 2022.

/S/ Maria T. Rodriguez

Maria T. Rodriguez, Attorney at Law
P.O. Box 2176
Tarpon Springs, FL 34688
Tel: (727) 238-2342
Fla. Bar No.: 0168180 / US FL MD /
US DC Court: Admitted *pro hac vice*
Email: attorneymaria@attorneymaria.com