

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

DEREK GUNBY,
Defendant.

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Case No. 1: 21-cr-626 (PLF)

**MOTION FOR ADMISSION *PRO HAC VICE* OF ROGER
ROOTS**

Pursuant to Local Civil Rule 44.1(c)(2), 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 has also been admitted to the U.S. District of Nebraska and the U.S. 1st, 8th, 9th, and 10th Circuits.

5. I am attaching a June 19, 2023, letter regarding Mr. Roots bar status from the Rhode Island Supreme Court disciplinary counsel. The letter states that Mr. Roots has no history of discipline, no current complaints and no charges pending.
6. During the past year, while Mr. Roots has been waiting for his general admission to the DC federal bar he has also applied PHV and been admitted as co-counsel for eight separate defendants: Dominic Pezzola, Lloyd Cruz, Christopher Alberts, Kirsten Niemela, Lesperance et al., and Kenneth Joseph Thomas, Nancy Barron, and Ryan Zink. Mr. Roots has also applied for pro hac vice status in two additional cases: Jesse Rumson, and this case.
7. Mr. Roots does wish to be admitted generally, and his admission is pending and not yet ruled on, thus requiring this application for PHV.

WHEREFORE, movant respectfully requests that the Court enter an order permitting Roger Roots to appear *pro hac vice* in the above-captioned case.

Dated: October 25, 2023

/s/ John M. Pierce
John M. Pierce
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CERTIFICATE OF SERVICE

I hereby certify that, on October 25, 2023, this motion and 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