

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)
)
 v.)
)
 TODD TILLEY)
)
 Defendant.)
_____)

Case No. 1:22-mj-00140

AMENDED MOTION FOR ADMISSION PRO HAC VICE

Allen H. Orenberg, counsel for Defendant Todd Tilley, hereby respectfully moves this Court for entry of an Order permitting Robert A. Levine to appear *pro hac vice* in accordance with LCrR 44.1 (c) (6). In support thereof, I hereby submit the accompanying Declaration, along with a proposed Order for the Court’s consideration.

1. Robert A. Levine and his firm have been retained by the Defendant for representation in the above-captioned case.
2. Robert A. Levine does not engage in the practice of law from any office located in the District of Columbia, is not a member of the District of Columbia Bar and does not have an application for membership pending.
3. Mr. Robert A. Levine has been in regular communication with the Defendant throughout the time period that the case has been pending.
4. Mr. Robert A. Levine has completed a declaration required by Local Criminal Rule LCr44.1 (c) (6), which is attached as an exhibit to this motion.
5. This case is not a related or consolidated matter for which Mr. Robert A. Levine has previously applied to appear *pro hac vice*.
6. The office address of Mr. Robert A. Levine is: 17 South Street, Portland, Maine 04101.

7. Mr. Robert A. Levine regularly practices in federal court 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.
8. Mr. Robert A. Levine 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. Robert A. Levine experience and credentials outlined above, it is respectfully requested that this Court grant this motion and admit Mr. Robert A. Levine *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. Robert A. Levine 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,

Allen H. Orenberg, Bar No. 395519
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CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of July, 2022, I filed the foregoing Amended 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