

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

UNITED STATES OF AMERICA

Plaintiff,

v.

MICHAEL T. FLYNN,

Defendant.

Criminal Action No. 17- 232 (EGS)

**MOTION OF JOHN GLEESON FOR
ADMISSION *PRO HAC VICE***

Pursuant to Rule 83.2(d) of the Local Rules of this Court, John Gleeson, by undersigned sponsoring counsel, moves the Court for permission to appear *pro hac vice* in the above-captioned case. In support of the motion, Mr. Gleeson provides his declaration, attached as Exhibit A.

The undersigned further moves that Mr. Gleeson be conferred full privileges to file and receive papers through the Court's CM/ECF system in this proceeding, the same as if he were a member of the Bar of this Court; and that Mr. Gleeson be excused from the requirement of Local Civil Rule 83.2(c)(1) that a member in good standing of the Bar of this Court must join and sign papers he may file in this proceeding, based on Mr. Gleeson's broad experience in litigating in numerous federal judicial

districts and his colleagues and support staff who are experienced litigating in this Court and filing papers in its CM/ECF system.

Dated: May 15, 2020

Respectfully submitted,

Counsel for Petitioners:

/s/ Timothy Beeken
Timothy Beeken (N.Y. Bar No. 2492650)
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022-3916
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EXHIBIT A

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DECLARATION OF JOHN GLEESON

I, JOHN GLEESON ("Applicant"), declare as follows:

1. Request for Admission: Applicant is a partner in the law firm Debevoise & Plimpton LLP and requests admission *pro hac vice* pursuant to the Court's appointment of Applicant to serve as *amicus curiae* in this matter.

2. Name and Address of Applicant's Law Firm:

Debevoise & Plimpton LLP
919 Third Avenue
New York, NY 10022
Tel: 212-909-6000
Fax: 212-909-6836

3. Bar Admission(s): Applicant is a member of the following courts and bars:

New York State Bar
Admitted December 23, 1981
Bar No. 1820992 - AD2

Eleventh Circuit
Admitted May 1, 2020
Bar No. 032511528

U.S. District Court for Northern Illinois
Admitted October 16, 2019
Bar No. 1820992

U.S. District Court for the Eastern District of Michigan
December 27, 2019

U.S. District Court for the Eastern District of New York
Admitted June 13, 1984
Bar No. JG9924

U.S. District Court for the Northern District of New York
Admitted September 20, 2019
Bar No. 701317

U.S. District Court for the Southern District of New York
Admitted June 28, 1983
Bar No. JG9924 (Attorney's UPI # 0992)

U.S. District Court for the Western District of New York
Admitted July 29, 2019

Second Circuit
Admitted November 7, 2016

Third Circuit
Admitted October 28, 1991

4. Certification of Good Standing: Applicant certifies that he has not been disbarred, censured, or disciplined by any court of record or state bar association. There are no pending disciplinary proceedings against Applicant.

5. Previous Appearances in this Court: Applicant has not been admitted *pro hac vice* in this Court within the last two years.

6. Residence Outside District: Applicant resides and practices law from an office outside this district, is not a member of the District of Columbia Bar, and does not have an application for membership pending.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND
CORRECT.

EXECUTED this 15th day of May 2020.

A handwritten signature in cursive script, reading "John Gleeson", written over a horizontal line.

John Gleeson



**Appellate Division of the Supreme Court
of the State of New York
Second Judicial Department**

I, Aprilanne Agostino, Clerk of the Appellate Division of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that **John Gleeson** was duly licensed and admitted to practice as an Attorney and Counselor-at-Law in all the courts of the State, according to the laws of the State and the court rules and orders, on the **23rd** day of **December 1981**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors-at-Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an Attorney and Counselor-at-Law.

In Witness Whereof, I have hereunto set my hand and affixed the seal of said Appellate Division on **May 07, 2020**.



Aprilanne Agostino

Clerk of the Court

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[PROPOSED] ORDER

UPON CONSIDERATION of the Motion of John Gleeson made pursuant to Rule 83.2(d) of the Local Rules of this Court and the supporting declaration, the Court grants attorney John Gleeson *pro hac vice* admission to this Court.

UPON CONSIDERATION of the Motion of John Gleeson to be conferred full privileges to file and receive papers through the Court's CM/ECF system in this proceeding and be excused from the requirement of Local Civil Rule 83.2(c)(1) that papers he files must join and be signed by a member of the Bar of this Court, the Motion is GRANTED.

IT IS, this is _____ day of May, 2020, SO ORDERED.

The Honorable Emmet G. Sullivan
United States District Judge