

FILED**SEP 8 2004**

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
Charleston DIVISION**

JOSE PADILLA

**LARRY W. PROPPES, CLERK
CHARLESTON, SC**

Plaintiff/Petitioner/USA, v.

Case No. 2:04-2221-26AJ

COMMANDER C.T. HANFT, USN
COMMANDER, CONSOLIDATED NAVAL BRIG

Application/Affidavit for

Defendant/Respondent.

**Pro Hac Vice Admission
and Order**

- (1) Name. JONATHAN MARC FREIMAN
First Middle Last
- (2) Residence. I reside at the following address:
- 109 FOSTER STREET NEW HAVEN CT 06511
Street City State Zip Code

(If a resident of South Carolina, Applicant should indicate for how long: N/A months/years.)

- (3) Business Address. I am an attorney and practice law under the name of or as a member of the following firm:

Firm name: WIGGIN AND DANA LLP
Mailing address: ONE CENTURY TOWER, P.O. BOX 1832, NEW HAVEN, CT 06508-1832
Telephone number: (203) 498-4400
Facsimile number: (203) 782-2889
Email address: jfreiman@wiggin.com

- (4) Jurisdiction of this Court. I, by execution of this Application and Affidavit, consent and agree to comply with the applicable statutes, laws, and rules of the State of South Carolina, with all federal rules, and with the Local Rules of the United States District Court for the District of South Carolina (particularly, Local Civil Rule 83.I.08 and/or Local Criminal Rule 57.I.08). I consent to the jurisdiction of the United States District Court for the District of South Carolina in all matters of attorney conduct.¹
- (5) Regular Practice of Law. I am a member in good standing of the bar of the highest court of the District of Columbia or the State of CONNECTICUT where I regularly practice law. **Attached is my certificate of good standing.**
- (6) Additional Bar Membership. I have been admitted to practice before the following courts: (List all of the courts Applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.) By signing this Affidavit, I certify that I am a member in good standing of each of the listed bars unless otherwise noted.

Court	Date Admitted	Good Standing
U.S. DISTRICT COURT DISTRICT OF CONNECTICUT	12/2/02	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
STATE OF CONNECTICUT	11/15/00	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
U.S. SUPREME COURT	1/12/04	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

¹ This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

25

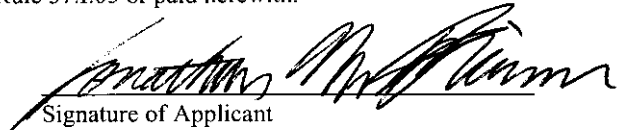
- (7) Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures?
☐ Yes ☒ No
(If "yes," give particulars, such as jurisdiction, court, date, grounds. Information to comply with this paragraph may be provided *in camera* but that fact shall be revealed below.)
- (8) Curtailment of Prior Pro Hac Vice Admissions. Have you ever had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked? . . . ☐ Yes ☒ No
(If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)
- (9) Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?
☐ Yes ☒ No
(If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)
- (10) Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States? . . . ☐ Yes ☒ No
(If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)
- (11) Present and Previous Pro Hac Vice in this Court. Have you, within the last ten (10) years, filed an application to appear *pro hac vice* in the United States District Court for the District of South Carolina or another court in the state of South Carolina? . . . ☐ Yes ☒ No
(If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.
- (12) Designated Local Counsel. Local counsel of record associated with Applicant in this case is:
- Attorney Name: MICHAEL P. O'CONNELL
Street Address or Post Office Box: 145 KING STREET, SUITE 410
City, State, and Zip Code: CHARLESTON, SC 29401
Telephone Number: (843) 577-9890

I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

- (13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

PROFESSOR JENNY S. MARTINEZ--STANFORD LAW SCHOOL
ANDREW PATEL--NEW YORK, NEW YORK
DONNA S. NEWMAN--NEW YORK, NEW YORK AND MICHAEL P. O'CONNELL, CHARLESTON, S.C.

- (14) Filing Fee. I affirm that the filing fee of one hundred and fifty dollars (\$150) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.


Signature of Applicant

Sworn to and subscribed before me

this 7th day of September 2004
Geraldine Maruano
A Notary Public
of the State of ct.

My Commission expires:

My Commission Expires Jan. 31, 2005



State of Connecticut
Supreme Court

I, Michele T. Angers, Chief Clerk of the Supreme Court of the State of Connecticut and keeper of the Seal thereof,

Do hereby certify that, in the Superior Court at New Haven *,*
on the fifteenth *, day of* November *,*
2000 *,*

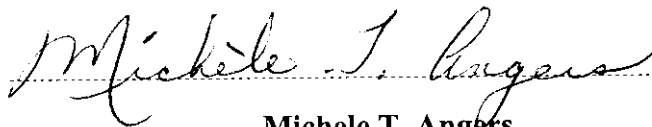
Jonathan Marc Freiman

of

New Haven, CT

having been examined and found duly qualified, was sworn as an attorney and admitted to practice before all the courts of this state, that the person named above has been and is still a member in good standing of the Bar of this State.

In Testimony Whereof, I have hereunto set my hand and affix the Seal of the Supreme Court of the State of Connecticut, at Hartford, this first *day of*
September *, 20 04* *.*



Michele T. Angers

Chief Clerk

