

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
(charleston) DIVISION)

FILED

SEP 8 2004

LARRY W. PROPPS, CLERK
CHARLESTON, SC

JOSE PADILLA,

Plaintiff/Petitioner/USA,
v.
COMMANDER C.T. HANFT, USN
COMMANDER, CONSOLIDATED NAVAL BRIG

Defendant/Respondent.

Case No. 2:04-2221-26AJ

**Motion
in Support of
Pro Hac Vice Application**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that JONATHAN M. FREIMAN be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.

5. Certification of Consultation (Local Civil Rule 7.02).

☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

STIRLING & O'CONNELL

Firm Name

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Name of Local Counsel

Signature of Local Counsel

Local Counsel for the PETITIONER

District of South Carolina

Federal Bar Number 4260