

IN THE SUPREME COURT OF FLORIDA

JOHN ELLIS “JEB” BUSH, <i>et al.</i>,)	
)	
Defendants/Appellants)	
)	
CHARLES J. CRIST, JR., <i>et al.</i>,)	Case Nos. SC04-2323
)	SC04-2324, SC04-2325
)	
Defendants/Appellants,)	
)	
BRENDA MCSHANE, <i>et al.</i>,)	
)	
Intervenors/Defendants/Appellants,)	
v.)	
)	
RUTH D. HOLMES, <i>et al.</i>)	
)	
Appellees.)	
)	

VERIFIED MOTION FOR ADMISSION PRO HAC VICE

Amicus Curiae United States of America respectfully moves this Court pursuant to Rule 2.061(b), Florida Rules of Judicial Administration and Rule 9.440, Florida Rules of Appellate Procedure, for leave of David K. Flynn to appear as counsel for *Amicus Curiae* in the above styled action.

1. Mr. Flynn is an attorney and active member in good standing of the Bars of the State of New York and the District of Columbia.
2. Mr. Flynn has never sought *pro hac vice* admission in any Florida Court.
3. Mr. Flynn has never been disciplined in any manner in the preceding five

years, nor are there any disciplinary proceedings pending against him.

4. Representation of *Amicus Curiae* United States of America commenced with the filing of the United States of America's *amicus curiae* brief on January 24, 2005.

5. The undersigned states that all applicable provisions of the Rules of Judicial Administration and the Rules Regulating the Florida Bar have been read and that this verified motion complies with such rules.

6. The name, record bar address and membership status of the Florida Bar members associated for the purposes of representation are: Gregory R. Miller, Florida Bar No. 284777, United States Attorney for the Northern District of Florida and E. Bryan Wilson, Florida Bar No. 604501, Assistant United States Attorney, 111 North Adams Street, Fourth Floor, Tallahassee, FL 32301, who are active members in good standing of the Florida Bar.

7. Mr. Gregory Miller, Mr. E. Bryan Wilson, and Mr. David K. Flynn hereby certify that a copy of this verified motion has been served upon counsel of record in this matter.

VERIFICATION

I HEREBY VERIFY under penalty of perjury that the facts stated in the foregoing motion are true and correct.

U.S. Department of Justice
Civil Rights Division
Appellate Section
Ben Franklin Station
P.O. Box 14403
Washington, DC 20044-4403
202-514-4541

DAVID K. FLYNN

Subscribed and sworn before me this
_____ day of January 2005

Notary Public, City of Washington
District of Columbia.

Notary Public

My commission expires_____.

WHEREFORE, the Court is respectfully requested to enter an Order granting *pro hac vice* status as requested above.

Respectfully submitted,

GREGORY R. MILLER
United States Attorney for the
Northern District of Florida

E. BRYAN WILSON
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Attorneys for *Amicus Curiae* United States of America

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing VERIFIED MOTION FOR ADMISSION PRO HAC VICE has been delivered on January 25, 2005, via Federal Express next-day delivery, to:

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