

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

v.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
█, individually

Defendant(s).

EMERGENCY VERIFIED MOTION TO APPEAR PRO HAC VICE

COMES NOW Paul G. Cassell, Movant herein files this Verified Motion to Appear Pro Hac Vice on behalf of █, █, and Jane Doe and respectfully represents the following:

1. Movant resides at Salt Lake City, Utah.
2. Movant is an attorney and a professor of law at the S.J. Quinney College of Law at the University of Utah. As permitted by University of Utah regulations, Movant undertakes some private representations as well as pro bono representations.
3. Movant has been retained personally to, in conjunction with other attorneys, provide legal representation to three child sexual assault victims of Jeffrey Epstein, who will be referred to pseudonymously as █, █, and Jane Doe in connection with various Epstein-related litigation, including Jane Doe v. Epstein, No. 9:08-cv-80893-Marra/Johnson (S.D. Fla.); Jane Doe 1 & 2. v. United States, No. 9:08-cv-80736-KAM (S.D. Fla.)). Movant has been

admitted *pro hac vice* in both of the above-described cases and worked with other Florida attorneys in providing this representation.

4. Movant is an active member in good standing and currently eligible to practice law in Utah (bar number 6078).

5. There are no disciplinary proceedings against Movant.

6. Within the past five (5) years, Movant has not been subject to any disciplinary proceedings.

7. Movant has never been subject to any suspension proceedings.

8. Movant has never been subject to any disbarment proceedings.

9. Movant, either by registration, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

10. Movant is not an inactive member of The Florida Bar.

11. Movant is not now and has never been a member of The Florida Bar.

12. Movant is not a suspended member of The Florida Bar.

13. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.

14. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

15. Local counsel of record associated with Movant in this matter is Attorney Jay Howell, a member of the Florida Bar who has represented ■■■, ■■■, and Jane Doe, and maintains his practice in Jacksonville, Florida.

16. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

17. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

DATED this 5 day of March, 2018.

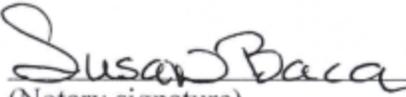
STATE OF Utah)
) ss
COUNTY OF Salt Lake)

I, Paul G. Cassell, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.



Paul G. Cassell

The foregoing instrument was acknowledged before me this 5th day of March, 2018, by Paul G. Cassell, who is personally known to me or who has produced self-knowledge as identification and who did/did not take an oath.



(Notary signature)

Susan Baca

(Notary name printed)

NOTARY PUBLIC

695586

(Notary serial number)



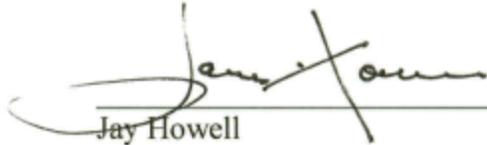
SEAL

CERTIFICATE RE: E-FILING AND E-SERVICE

I hereby certify that this Emergency Verified Motion To Appear Pro Hac Vice was filed electronically in compliance with Florida Rules of Judicial Administration 2.515 and 2.516(e) and furnished via e-serve to the attorneys listed on the Service List below, and a copy was sent to The Florida Bar, 651 E. Jefferson Street, Tallahassee, FL 32399 along with a check made payable to The Florida Bar in the amount of \$250.00 for the fee, via Federal Express, this 7 day of March, 2018.

Respectfully Submitted,

JAY HOWELL & ASSOCIATES



Jay Howell
Florida Bar No.: 225657
644 Cesery Blvd., Suite 250
Jacksonville, FL 32211

E-Mail: [REDACTED]
Attorney for [REDACTED], [REDACTED], and Jane Doe

Service List:

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[REDACTED]
Attorney for [REDACTED], [REDACTED] and Jane Doe

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[REDACTED]
Co-Counsel for Plaintiff/Counter-Defendant Jeffrey Epstein

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[REDACTED]
Counsel for Defendant Scott Rothstein

RULE 2.510.FOREIGN ATTORNEYS

(a) Eligibility. Upon filing a verified motion with the court, an attorney who is an active member in good standing of the bar of another state and currently eligible to practice law in a state other than Florida may be permitted to appear in particular cases in a Florida court upon such conditions as the court may deem appropriate, provided that a member of The Florida Bar in good standing is associated as an attorney of record. In determining whether to permit a foreign attorney to appear pursuant to this rule, the court may consider, among other things, information provided under subdivision (b)(3) concerning discipline in other jurisdictions. No attorney is authorized to appear pursuant to this rule if the attorney (1) is a Florida resident, unless the attorney has an application pending for admission to The Florida Bar and has not previously been denied admission to The Florida Bar; (2) is a member of The Florida Bar but is ineligible to practice law; (3) has previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation permitted pursuant to this rule provided, however, the contempt is final and has not been reversed or abated; (4) has failed to provide notice to The Florida Bar or pay the filing fee as required in subdivision (b)(7); or (5) is engaged in a "general practice" before Florida courts. For purposes of this rule, more than 3 appearances within a 365-day period in separate representations shall be presumed to be a "general practice." In cases involving indigent clients, the court may waive the filing fee for good cause shown.

(b) Contents of Verified Motion. A form verified motion accompanies this rule and shall be utilized by the foreign attorney. The verified motion required by subdivision (a) shall include:

(1) a statement identifying all jurisdictions in which the attorney is an active member in good standing and currently eligible to practice law including all assigned bar numbers and attorney numbers;

(2) a statement identifying by date, case name, and case number all other matters in Florida state courts in which pro hac vice admission has been sought in the preceding 5 years, and whether such admission was granted or denied;

(3) a statement identifying all jurisdictions in which the attorney has been disciplined in any manner in the preceding 5 years and the sanction imposed, or in which the attorney has pending any disciplinary proceeding, including the date of the disciplinary action and the nature of the violation;

(4) a statement identifying the date on which the legal representation at issue commenced, and the party or parties represented;

(5) a statement that all applicable provisions of these rules and the Rules Regulating the Florida Bar have been read, and that the verified motion complies with those rules;

(6) the name, record bar address, and membership status of the Florida Bar member or members associated for purposes of the representation;

(7) a certificate indicating service of the verified motion upon all counsel of record in the matter in which leave to appear pro hac vice is sought and upon The Florida Bar at its Tallahassee office accompanied by a nonrefundable \$250.00 filing fee made payable to The Florida Bar or notice of the waiver of the fee; and

(8) a verification by the attorney seeking to appear pursuant to this rule and the signature of the Florida Bar member or members associated for purposes of the representation.

Lawyer Regulation

Rules Regulating The Florida Bar

1 GENERAL

1-3 MEMBERSHIP

RULE 1-3.10 APPEARANCES BY NON-FLORIDA LAWYERS IN A FLORIDA COURT

RULE 1-3.10. APPEARANCE BY NON-FLORIDA LAWYER IN A FLORIDA COURT

(a) **Non-Florida Lawyer Appearing in a Florida Court.** A practicing lawyer of another state, in good standing and currently eligible to practice, may, upon association of a member of The Florida Bar and verified motion, be permitted to practice upon such conditions as the court deems appropriate under the circumstances of the case. Such lawyer shall comply with the applicable portions of this rule and the Florida Rules of Judicial Administration.

(1) **Application of Rules Regulating The Florida Bar.** Lawyers permitted to appear by this rule shall be subject to these Rules Regulating The Florida Bar while engaged in the permitted representation.

(2) **General Practice Prohibited.** Non-Florida lawyers shall not be permitted to engage in a general practice before Florida courts. For purposes of this rule more than 3 appearances within a 365-day period in separate representations shall be presumed to be a "general practice."

(3) **Effect of Professional Discipline or Contempt.** Non-Florida lawyers who have been disciplined or held in contempt by reason of misconduct committed while engaged in representation that is permitted by this rule shall thereafter be denied admission under this rule and the applicable provisions of the Florida Rules of Judicial Administration.

(b) **Lawyer Prohibited From Appearing.** No lawyer is authorized to

appear pursuant to this rule or the applicable portions of the Florida Rules of Judicial Administration if the lawyer:

- (1) is disbarred or suspended from practice in any jurisdiction;
- (2) is a Florida resident;
- (3) is a member of The Florida Bar but ineligible to practice law;
- (4) has previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation permitted pursuant to this rule;
- (5) has failed to provide notice to The Florida Bar or pay the filing fee as required by this rule; or
- (6) is engaged in a "general practice" as defined elsewhere in this rule.

(c) Content of Verified Motion for Leave to Appear. Any verified motion filed under this rule or the applicable provisions of the Florida Rules of Judicial Administration shall include:

- (1) a statement identifying all jurisdictions in which the lawyer is currently eligible to practice law;
- (2) a statement identifying by date, case name, and case number all other matters in Florida state courts in which pro hac vice admission has been sought in the preceding 5 years, and whether such admission was granted or denied;
- (3) a statement identifying all jurisdictions in which the lawyer has been disciplined in any manner in the preceding 5 years and the sanction imposed, or all jurisdictions in which the lawyer has pending any disciplinary proceeding, including the date of the disciplinary action and the nature of the violation, as appropriate;

(4) a statement identifying the date on which the legal representation at issue commenced and the party or parties represented;

(5) a statement that all applicable provisions of this rule and the applicable provisions of the Florida Rules of Judicial Administration have been read and that the verified motion complies with those rules;

(6) the name, record bar address, and membership status of the Florida Bar member or members associated for purposes of the representation;

(7) a certificate indicating service of the verified motion upon all counsel of record in the matter in which leave to appear pro hac vice is sought and upon The Florida Bar at its Tallahassee office accompanied by a nonrefundable \$250.00 filing fee made payable to The Florida Bar or notice of the waiver of the fee; and

(8) a verification by the lawyer seeking to appear pursuant to this rule or the applicable provisions of the Florida Rules of Judicial Administration and the signature of the Florida Bar member or members associated for purposes of the representation.

[Updated: 01-01-2006]

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2/6/2006