

IN THE DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
FOURTH DISTRICT

CASE NO. 4D18-0762

JEFFREY EPSTEIN,

Petitioner,

-vs-

SCOTT ROTHSTEIN,
individually, BRADLEY J.
EDWARDS, individually, and
L.M., E.W., and JANE DOE,
Intervenors.

Respondents

**VERIFIED MOTION FOR ADMISSION TO APPEAR
PRO HAC VICE PURSUANT TO FLORIDA RULE OF
JUDICIAL ADMINISTRATION 2.510**

Intervenor/respondents L.M., E.W., and Jane Doe (hereinafter “the victims”), by and through its undersigned counsel, hereby moves this Honorable Court to allow Paul G. Cassell (“Movant”) to appear as counsel for the victims in this *Epstein v. Edwards* case and represents the following:

1. Movant resides in Salt Lake City, Utah.
2. Movant is an attorney and employed as a professor of law at the S.J. Quinney College of Law at the University of Utah. As permitted by University of

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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 L.M., E.W., 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. Movant has also been admitted *pro hac vice* in the proceedings below.

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 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. In the last five years, Movant has filed a motion to appear as counsel in Florida state courts in the proceedings below and in *Edwards v. Dershowitz*, Case NO.: CACE 15-000072 (Circuit Ct. of the 17th Judicial Circuit in and for Broward County, Florida) (motion granted).
11. Movant is not an inactive member of The Florida Bar.
12. Movant is not now and has never been a member of The Florida Bar.
13. Movant is not a suspended member of The Florida Bar.
14. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation from The Florida Bar.
15. 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.
16. Local counsel of record associated with Movant in this matter is Attorney Jay Howell, a member of the Florida Bar who has represented L.M., E.W., and Jane Doe, and maintains his practice in Jacksonville, Florida.

17. 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.

18. 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 the *Epstein v. Edwards* case.

DATED this 13th day of March, 2018

/s/ Paul G. Cassell
PAUL G. CASSELL
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of Utah
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¹ This daytime business address is provided for contact purposes only and is not intended to imply institutional endorsement by the University of Utah.

CERTIFICATE OF LOCAL COUNSEL

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

DATED this 13th day of March, 2018.

By: 

JAY HOWELL

Jay Howell & Associates

Florida Bar No.: 225657

Attorney E-Mail(s): 

644 Cesery Blvd. #250

Jacksonville, FL 32211



CERTIFICATE OF E-FILING AND SERVICE

Counsel hereby certify that this Motion to Appear Pro Hac Vice has been e-filed and a true copy of the foregoing was furnished by mail to The Honorable Donald W. Hafele, 205 N. Dixie Highway, Room 10.1216, West Palm Beach, FL 33401, and to all counsel on the attached service list, by email, on March 13, 2018.

By: 

JAY HOWELL

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