

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

UNITED STATES OF AMERICA,

v.

Case No.: 23-cr-80101-AMC

DONALD J. TRUMP, et al.,

Defendants.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Lauren Russell of the law firm of Ballard Spahr LLP, 1909 K Street NW, 12th Floor, Washington, DC 20006, (202) 661-2200, for purposes of appearance as co-counsel on behalf of Cable News Network, Inc., Advance Publications, Inc., American Broadcasting Companies, Inc. d/b/a ABC News, The Associated Press, Bloomberg L.P., CBS Broadcasting, Inc. o/b/o CBS News, Cox Enterprises, Inc. d/b/a The Atlanta Journal-Constitution, Dow Jones & Company, Inc., publisher of The Wall Street Journal, The E.W. Scripps Company, Gray Media Group, Inc., Los Angeles Times Communications LLC, publisher of The Los Angeles Times, National Public Radio, Inc., National Cable Satellite Corporation d/b/a C-SPAN, NBCUniversal Media, LLC d/b/a NBC News, The New York Times Company, POLITICO LLC, Radio Television Digital News Association, Reuters News & Media Inc., TEGNA Inc., Telemundo Network Group LLC d/b/a Noticias Telemundo, Univision Network & Studios, Inc., and WP Company LLC d/b/a The

Washington Post, in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Lauren Russell to receive electronic filings in this case, and in support thereof states as follows:

1. Lauren Russell is not admitted to practice in the Southern District of Florida and is a member in good standing of the bars of the District of Columbia, Delaware, North Carolina, and Maryland; and is admitted to practice before the U.S. District Courts for the District of Columbia, Delaware, Northern District of New York, Eastern District of North Carolina, Western District of North Carolina; and the U.S. Court of Appeals for the D.C. Circuit.

2. Movant Charles D. Tobin, of the law firm of Ballard Spahr LLP, 1909 K St., NW, 12th Floor, Washington, D.C., 20006, (202) 661-2200, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, and contemporaneously with this filing, Lauren Russell has made payment of this Court's \$200 admission fee.

4. Lauren Russell, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings at email address: russelll@ballardspahr.com.

WHEREFORE, Charles D. Tobin moves this Court to enter an Order allowing Lauren Russell to appear before this Court on behalf of Cable News Network, Inc., Advance Publications, Inc., American Broadcasting Companies, Inc. d/b/a ABC News, The Associated Press, Bloomberg L.P., CBS Broadcasting, Inc. o/b/o CBS News, Cox Enterprises, Inc. d/b/a The Atlanta Journal-Constitution, Dow Jones & Company, Inc., publisher of The Wall Street Journal, The E.W. Scripps Company, Gray Media Group, Inc., Los Angeles Times Communications LLC, publisher of The Los Angeles Times, National Public Radio, Inc., National Cable Satellite Corporation d/b/a C-SPAN, NBCUniversal Media, LLC d/b/a NBC News, The New York Times Company, POLITICO LLC, Radio Television Digital News Association, Reuters News & Media Inc., TEGNA Inc., Telemundo Network Group LLC d/b/a Noticias Telemundo, Univision Network & Studios, Inc., and WP Company LLC d/b/a The Washington Post, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to her.

Dated: June 26, 2023

Respectfully submitted,

BALLARD SPAHR LLP

By: /s/ Charles D. Tobin

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CERTIFICATION OF LAUREN RUSSELL

Lauren Russell, Esquire, pursuant to Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of the bars of the District of Columbia, Delaware, North Carolina, and Maryland; and am admitted to practice before the U.S. District Courts for the District of Columbia, Delaware, Northern District of New York, Eastern District of North Carolina, Western District of North Carolina; and the U.S. Court of Appeals for the D.C. Circuit; and (3) I have not filed three or more motions for *pro hac vice* admission in this District within the last 365 days.



Lauren Russell