# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

No. 23-cr-257-TSC

v.

DONALD J. TRUMP,

Defendant.

Jerendant.

#### MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Criminal Rule 44.1(c), Todd Blanche, Esq. respectfully moves to appear *pro hac vice* and participate as counsel for President Donald J. Trump in the above-captioned matter.

This motion is supported by Mr. Blanche's declaration and a certificate of good standing.<sup>1</sup> As set forth in the declaration, Mr. Blanche is an active member in good standing of the bars of New York; the United States District Court for the Southern and Eastern Districts of New York; and the United States Court of Appeals for the Second Circuit.

This motion is also supported by John F. Lauro, Esq., an active and sponsoring member of the Bar of this Court. Mr. Lauro's signature is below.

WHEREFORE, Mr. Blanche respectfully requests that the Court grant this motion and allow him to appear *pro hac vice* and participate as counsel in this matter.

[SIGNATURE PAGE FOLLOWS]

<sup>&</sup>lt;sup>1</sup> The certificate was issued on June 8, 2023. Mr. Blanche ordered an updated copy on August 2, 2023, and will file it upon receipt.

Dated: August 3, 2023

/s/ Todd Blanche
Todd Blanche, Esq.
toddblanche@blanchelaw.com
BLANCHE LAW
99 Wall St., Suite 4460
New York, NY 10005
(212) 716-1250

Respectfully submitted,

/s/ John F. Lauro
John F. Lauro, Esq.
D.C. Bar No. 392830
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Tampa, FL 33602
(813) 222-8990

Counsel for President Donald J. Trump

### UNITED STATES DISTRICT COURT

#### DISTRICT OF COLUMBIA

Ur	nited States of America	
	Plaintiff(s)	
vs.	) Case Number: 23-cr-257-TSC	
Donald J. Trump		
	Defendant(s)	
	DECLARATION FOR PRO HAC VICE ADMISSION (to be attached to Motion for Pro Hac Vice Admission)	
the	In accordance with LCvR 83.2 (c)(2) and LCvR 44.1 (c)(2), I hereby declare that answers to the following questions are complete, true, and correct:	
1.	Full Name: Todd Blanche	
2.	State bar membership number: New York - 4192456	
3.	Business address, telephone and fax numbers:	
	99 Wall Street, Suite 4460, New York, NY 10005; tel: (212) 716-1250	
4.	List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:	
	NY State Bar; USDC SDNY; USDC EDNY; USCA for the 2nd Circuit	
5.	Have you been denied admission, disbarred, suspended from practice, reprimanded, denied "in good standing" status, or otherwise disciplined by any court, bar association, grievance committee or administrative body? Yes No	
6.	Have any proceedings which could lead to any such disciplinary action been instituted against you	
	in any such bodies? Yes No 🗸	
	(Please attach a statement explaining any "Yes" answers to questions 5 or 6.)	
7.	List the number of times the attorney has been admitted pro hac vice into this court within the last	
	two years. 1	
	(If your principal office is located in the District of Columbia, please answer questions 8 and 9.)	
8.	Are you a member of the DC Bar? No	
9.	Do you have a pending application for admission into USDC for the District of Columbia? No	

In compliance with Local Rule 83.2(b) or LCrR 44.1(b), an attorney who wishes to appear as sole or lead counsel in a contested evidentiary hearing or trial on the merits further certifies that he/she:

#### (CHECK ALL ITEMS THAT APPLY)

1.	<b>V</b>	has previously acted as sole or lead counsel in a federal district court or the Superior Court of the District of Columbia or a state trial court of general jurisdiction in a contested jury or bench trial or other contested evidentiary hearing in which testimony was taken in open court and an order or other appealable judgment was entered. [LCvR 83.2(b)(1)/LCrR 44.1(b)(1)]; <u>OR</u>	
2.		has participated in a junior capacity in an entire contested jury or bench trial in a federal district court or the Superior Court of the District of Columbia or a state trial court of general jurisdiction. [LCvR 83.2(b)(2)/LCrR 44.1(b)(2)]; <b>OR</b>	
3.		has satisfactorily completed a continuing legal education trial advocacy course of at least 30 hours sponsored by the District of Columbia Bar or accredited by a State Bar. [LCvR 83.2(b)(3)/LCrR 44.1(b)(3)]	
	I dec	clare under penalty of perjury that the foregoing is true and correct.	
	August 3, 2023		
		DATE SIGNATURE OF ATTORNEY	



## Appellate Division of the Supreme Court of the State of New York Second Judicial Department

I, María T. Fasulo, Clerk of the Appellate Dívision of the Supreme Court of the State of New York, Second Judicial Department, do hereby certify that

### Todd W. Blanche

was duly licensed and admitted to practice as an Attorney and Counselor at Law in all the courts of this State on **February 11**, **2004**, has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counselors at Law on file in this office, is duly registered with the Administration Office of the Courts, and according to the records of this Court is currently in good standing as an Attorney and Counselor-at-Law.



In Witness Whereof, I have hereunto set my hand in the City of Brooklyn on June 8, 2023.

Maria 7. Fasulo

Clerk of the Court