

FILED

OCT 04 2017

Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)

v.)

GEORGE PAPADOPOULOS)

17cr182(RDM)

MOTION TO APPEAR *PRO HAC VICE*

Thomas M. Breen and Robert W. Stanley, attorneys for Defendant George Papadopoulos, pursuant to Local Criminal Rule 44.1(d), respectfully moves this Honorable Court for their admission and appearance *pro hac vice* in the above captioned matter, and to waive the requirement that counsel have a sponsoring member in good standing of the bar of this Court sign the instant motion. In support thereof, Counsel shows to the Court the following:

1. As set forth in the attached declarations, Counsel are admitted and active members in good standing of the Bar of the State of Illinois, the United States District Court for the Northern and Central Districts of Illinois, and the United States Court of Appeals for the Seventh Circuit. Further, Counsel has no pending disciplinary proceedings against them and have not previously been disciplined by any bar.

2. Since approximately February 2017, Counsel has represented Defendant during the FBI's investigation into the Russian government's efforts to interfere with the 2016 presidential election.

3. On July 28, 2017, Defendant was arrested for making a false statement to the FBI and for obstruction of justice. Defendant's arrest and the criminal complaint were sealed by the Court and have remained under seal.

4. Since his arrest, Defendant has made efforts to cooperate with Special Counsel's investigation by participating in multiple proffer sessions and voluntarily turning over materials at the request of investigators. The parties have now reached a negotiated resolution to the charges pending against Defendant.

5. Specifically, on October 5, 2017, the parties will enter into a plea agreement, where in exchange for dismissing the criminal complaint, and forgoing other charges related to Defendant's conduct as outlined in the plea agreement, Defendant will plead guilty to making a false statement to the FBI in violation of 18 U.S.C. 1001. The parties anticipate requesting the Court delay Defendant's sentencing to allow Defendant to continue his efforts to cooperate with the Special Counsel's investigation. Additionally, to facilitate any further cooperation by Defendant, the parties have requested that Defendant's plea be taken in a closed courtroom and the case remain under seal for a period of time.

6. Local Criminal Rule 44.1(d) requires counsel seeking admission *pro hac vice* to file a motion signed by a member of the bar of this Court. For Counsel to obtain a sponsoring member of this Court's bar, it would be necessary to inform the sponsoring member of the existence and nature of this case.

7. Given the sensitive subject matter and underlying facts of this case, Counsel submits that obtaining a sponsoring member is impractical and not in the best interests of Defendant.

Wherefore, Counsel respectfully requests the Court grant their motion to appear *pro hac vice* and waive the requirement of Local Criminal Rule 44.1(d) that the motion be signed by a member of the bar of this Court.

Respectfully submitted,

/s/ Thomas M. Breen

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
) No. 1-17-MJ-539
)
v.)
)
GEORGE PAPADOPOULOS)

DECLARATION OF THOMAS M. BREEN
IN SUPPORT OF HIS MOTION FOR ADMISSION *PRO HAC VICE*

1. My name is Thomas M. Breen, counsel for George Papadopoulos, I am a member of the law firm Breen & Pugh.

2. My office is located at 53 West Jackson Boulevard, Suite 1215, Chicago, Illinois 60604. My office telephone number is (312) 360-1001.

3. I am a member in good standing of the Bar of the State of Illinois. I am also admitted to practice in the United States District Court for the Northern District of Illinois and the Central District of Illinois.

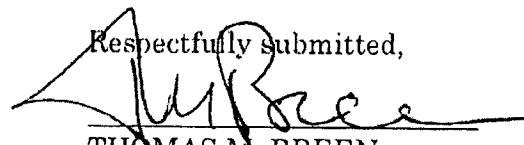
4. I certify that there are no pending disciplinary proceedings against me before any bar, and I have not previously been disciplined by any bar.

5. I have not previously been admitted *pro hac vice* before this Court.

6. I do not engage in the practice of law from any office located in the District of Columbia.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: October 4, 2017

Respectfully submitted,

THOMAS M. BREEN

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)
)
 v.) No. 1-17-MJ-539
)
GEORGE PAPADOPOULOS)

**DECLARATION OF ROBERT W. STANLEY
IN SUPPORT OF HIS MOTION FOR ADMISSION *PRO HAC VICE***

1. My name is Robert W. Stanley, counsel for George Papadopoulos, I am a member of the law firm Breen & Pugh.

2. My office is located at 53 West Jackson Boulevard, Suite 1215, Chicago, Illinois 60604. My office telephone number is (312) 360-1001.

3. I am a member in good standing of the Bar of the State of Illinois. I am also admitted to practice in the United States District Court for the Northern District of Illinois and the United States Court of Appeals for the Seventh Circuit.

4. I certify that there are no pending disciplinary proceedings against me before any bar, and I have not previously been disciplined by any bar.

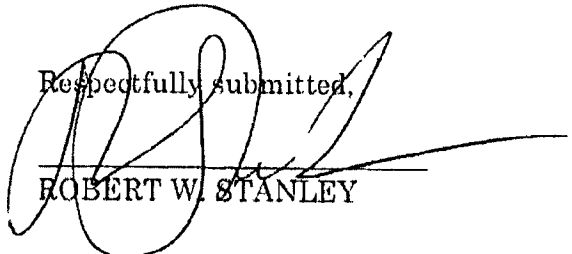
5. I have not previously been admitted *pro hac vice* before this Court.

6. I do not engage in the practice of law from any office located in the District of Columbia.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: October 4, 2017

Respectfully submitted,


ROBERT W. STANLEY