

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,
an Illinois non-profit corporation, and
Danny Lee Shelton, individually,

Case No. 07-40098-FDS

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*

Pursuant to Local Rule 83.5.3(b), undersigned counsel move this Court to grant leave to appear *pro hac vice* to Attorneys Gerald S. Duffy, William Christopher Penwell, Jerrie M. Hayes and Kristin L. Kingsbury of the Minnesota law firm Siegel, Brill, Greupner, Duffy & Foster, P.A. As grounds, the following is stated:

1. Undersigned counsel, both of whom are members in good standing of the bar of this Court, have filed the Complaint in this matter and will be acting as co-counsel throughout this litigation with Plaintiffs' primary counsel from the Minnesota law firm Siegel, Brill, Greupner, Duffy & Foster, P.A.

2. Plaintiffs now move through undersigned counsel to have Attorneys Gerald S. Duffy, William Christopher Penwell, Jerrie M. Hayes and Kristin L. Kingsbury, all of Siegel, Brill, Greupner, Duffy & Foster, P.A., admitted to appear *pro hac vice*.

3. In support of this Motion, Attorneys Duffy, Penwell, Hayes and Kingsbury have submitted the attached Certificates verifying that:

- (a) they are members of the bar in good standing in every jurisdiction in which they have been admitted to practice;
- (b) they have no disciplinary proceedings pending against them as members of the bar in any jurisdiction; and
- (c) they are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, undersigned counsel move this Court to grant leave to appear *pro hac vice* to Attorneys Duffy, Penwell, Hayes and Kingsbury.

RESPECTFULLY SUBMITTED,
For the Plaintiffs Three Angels Broadcasting
Network, Inc. and Danny Shelton,
By their attorneys,

Dated: May 1, 2007



John P. Pucci, BBO#407560
J. Lizette Richards BBO#649413
Fierst, Pucci & Kane, LLP
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Northampton, MA 01060
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CERTIFICATE OF SERVICE

I, J. Lizette Richards, do certify that I have this day served a copy of the foregoing document, along with attachments, on Defendant Gailon Joy by mailing same, first class postage prepaid to 3 Clinton Road, Box 1425, Sterling, MA 01564 , and on Defendant Robert Pickle by mailing same, first class postage prepaid to 1354 County Highway 21, Halsted, MN 56548 .

Dated: May 1, 2007



J. Lizette Richards