

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 Attorney M. Gregory Simpson of the Minnesota law firm Siegel, Brill, Greupner, Duffy & Foster, P.A. As grounds, the following is stated:

1. Undersigned counsel, both members in good standing of the bar of this Court, filed the Complaint in this matter and will continue to act 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 Attorney M. Gregory Simpson of Siegel, Brill, Greupner, Duffy & Foster, P.A. admitted to appear *pro hac vice*.
3. In support of this Motion, Attorney Simpson has submitted the attached Certificate verifying that:

- (a) he is a member of the bar in good standing in every jurisdiction in which he has been admitted to practice;
- (b) he has no disciplinary proceedings pending against him as a member of the bar in any jurisdiction; and
- (c) he is 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 Attorney Simpson.

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

Dated: May 22, 2008



John P. Pucci, BBO #407560
J. Lizette Richards, BBO #649413
Fierst, Pucci & Kane, LLP
64 Gothic Street
Northampton, MA 01060
Telephone: (413) 584-8067

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system, along with any attachments, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on May 22, 2008.

Dated: May 22, 2008



J. Lizette Richards