

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

UNITED STATES OF AMERICA,

v.

MICHAEL T. FLYNN,

Defendant.

**Crim. No. 17-232 (EGS)**

**MOTION FOR ADMISSION *PRO HAC VICE* OF DAVID H. FRY**

Pursuant to Criminal Local Rule 44.1(d) of the Local Rules of this Court, Elaine J. Goldenberg, undersigning sponsor counsel, respectfully moves this Court for the admission *pro hac vice* of Attorney David H. Fry, of Munger, Tolles & Olson LLP, to represent *amici curiae* The Steady State and Former National Security Officials in the above-captioned case. The movant, Elaine J. Goldenberg, is a member in good standing of the United States District Court for the District of Columbia and has entered her appearance in this matter.

This motion is accompanied by a declaration from Mr. Fry, attached hereto as Exhibit A, providing the information required by Rule 44.1(d). A [Proposed] Order is attached hereto as Exhibit B.

DATED: June 10, 2020

Respectfully submitted,

*/s/ Elaine J. Goldenberg*

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Elaine J. Goldenberg (DC Bar No. 478383)

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*Attorneys for Amici Curiae The Steady State and  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2020, I electronically filed the foregoing **MOTION FOR ADMISSION *PRO HAC VICE* OF DAVID H. FRY** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all registered participants.

*/s/ Elaine J. Goldenberg*

\_\_\_\_\_  
Elaine J. Goldenberg

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**DECLARATION OF DAVID H. FRY IN SUPPORT OF MOTION FOR ADMISSION  
*PRO HAC VICE***

I, David H. Fry, declare the following:

1. My full name is David H. Fry. I am an attorney with the law firm of Munger, Tolles & Olson LLP.

2. My business address is:

Munger, Tolles & Olson LLP  
560 Mission Street, 27th Floor  
San Francisco, CA 94105  
Tel.: (415) 512-4000  
Fax: (415) 512-4077  
david.fry@mto.com

3. I am a member in good standing of the State Bar of California (Bar Number 189276). Additionally, I have been admitted to practice in the following courts: (a) United States District Court for the Northern District of California, (b) United States District Court for the Eastern District of California, (c) United States District Court for the Central District of California, (d) United States District Court for the Southern District of California, (e) United States District Court for the District of Colorado, (f) United States District Court for the Eastern District of Michigan, (g) United States Court of Appeals for the Second Circuit, (h) United States Court of Appeals for the Third Circuit, (i) United States Court of Appeals for the Sixth Circuit,

(j) United States Court of Appeals for the Ninth Circuit, and (k) United States Court of Appeals for the Tenth Circuit.

4. I have not been disciplined by the bar of any state or court.

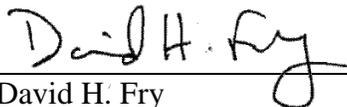
5. I have not been admitted *pro hac vice* in this Court within the last two years.

6. I am not engaged in the practice of law from an office located within the District of Columbia. I am not a member of the District of Columbia Bar. I do not have an application for membership pending with the District of Columbia Bar.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED: June 10, 2020

Respectfully submitted,



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**[PROPOSED] ORDER GRANTING MOTION FOR ADMISSION *PRO HAC VICE* OF  
DAVID H. FRY**

On the Motion of Elaine J. Goldenberg, counsel for *amici curiae* The Steady State and Former National Security Officials, for an order admitting David H. Fry to appear *pro hac vice*, and for good cause shown;

IT IS HEREBY ORDERED, that the Motion for Admission *Pro Hac Vice* is GRANTED and that David H. Fry is admitted *pro hac vice* to appear and participate in the above-captioned case.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2020

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The Honorable Emmet G. Sullivan  
United States District Court Judge