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Attorney for Intervenor

(Pro hac vice application filed)

Larry Klayman
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leklayman@gmail.com
Attorney for Intervenor

Of Counsel

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

MANUEL de JESUS ORTEGA MELENDRES, on
behalf of himself and all others similarly
situated; *et al.*

Plaintiff,

v.

JOSEPH M. ARPAIO, in his individual
And official capacity as Sheriff of Maricopa
County, Arizona; *et al.*

Defendants

DENNIS L. MONTGOMERY

Intervenor

Civil Action No.
CV-07-2513-PHX-GMS

CLARIFICATION OF MOTION FOR ADMITTANCE
PRO HAC VICE OF JONATHON A. MOSELEY

In response to the Honorable G. Murray Snow's Order of May 8, 2015, Jonathon A. Moseley, Movant for admittance *pro hac vice* on behalf of Dennis Montgomery, hereby clarifies his previously-filed Motion on the Court's standard form, in the following respects:

First, the Court asked for clarification of apparent inconsistency between my letter

1 accompanying my *pro hac vice* motion identifying my proposed representation of Dennis
2 Montgomery with a sentence within the body of my supplemental statement attached to the *pro hac*
3 *vice* form.

4 The sentence found within the supplemental statement about filing an *amicus curiae* brief
5 for Sheriff Joe Arpaio was inadvertently included and does not relate to this current case, and
6 should be stricken and ignored. The sentence was carried over inadvertently from a previous case
7 where I edited a prior *pro hac vice* application before another court. In this regard, I inadvertently
8 did not remove the statement attached to my application *pro hac vice* in the case of *State of Texas v.*
9 *United States of America*, U.S. District Court for the Southern District of Texas, Case No. 14-cv-
10 254. **Judge Andrew Hanen admitted me *pro hac vice* in that case, see Exhibits 1 and 2,**
11 **attached, on behalf of our client Sheriff Joe Arpaio and filed amicus briefs in that case.** I
12 recalled there was nothing case-specific in the attachment.

13
14 Second, the Court may have inquired as to whether the Intervenor Dennis L. Montgomery
15 would be adverse to the Defendants Sheriff Joe Arpaio and the Maricopa County Sheriff's Office
16 (MCSO).
17

18 Neither Dennis L. Montgomery nor his counsel are adverse to Sheriff Arpaio, his deputies,
19 the Cold Case Posse, or MCSO **in any respect**, particularly since this case involves a contempt
20 proceeding over allegations of profiling illegal immigrants.

21 Third, the Movant also requests to clarify that Dennis Montgomery is also a client of The
22 Klayman Law Firm as shown in the attached *pro hac vice* motion, attached as Exhibit 3. He is also
23 a client of Freedom Watch in a separate matter.
24

25 Fourth, the Clerk of the Court advised the applicant that upon filing of his motion for *pro*
26 *hac vice* admission he could file the motion to intervene (ECF. No. 1057) and for disqualification
27 (ECF. No. 1067).
28

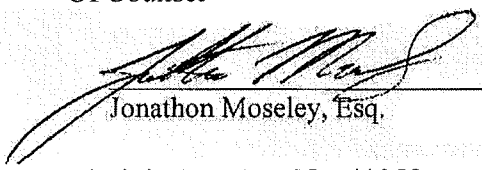
1 Finally, applicant is withdrawing the letter that accompanied the *pro hac vice* application but
2 not the *pro hac vice* application itself. My representation in this case involves the motion to
3 intervene and the motion for disqualification filed on May 7, 2015 and any related pleadings that
4 may prove necessary on behalf of Mr. Montgomery in this regard.

5
6 Dated: May 13, 2015

Respectfully submitted,

7 Larry Klayman
8 Freedom Watch, Inc.
9 2020 Pennsylvania Ave. NW Ste. 345
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12 leklayman@gmail.com
13 Attorney for Dennis Montgomery

14 Of Counsel

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Jonathon Moseley, Esq.

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leklayman@gmail.com
Attorney for Dennis Montgomery

(*Pro Hac Vice* application filed)

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2015, I served this document by U.S. mail and email to the following participants:

Stanley Young, Esq.
Andrew Carl Byrnes, Esq.
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11 Attorney for Defendant Joseph Arpaio and Maricopa County Sheriff's Office
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19 Attorney for Defendant Sheriff Joseph Arpaio
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24 125 Broad Street, 18th Fl.
25 New York, New York 10004
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27 212-549-2676
28 Attorney for Plaintiffs
(Service via Email)

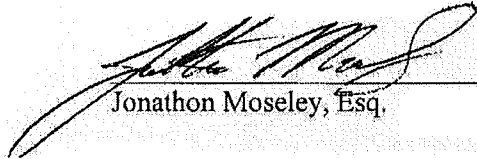
Anne Lai, Esq.
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1 Attorney for Plaintiffs
(Service via Email)

2 Richard K. Walker, Esq.
3 WALKER & PESKIND, PLLC
4 16100 N. 71st Street, Suite 140
5 Scottsdale, Arizona 85254-2236
6 rk@azlawpartner.com
7 480-483-6336

8 Attorney for Defendant Maricopa County
(Service via Email)

9 
Jonathon Moseley, Esq.

10 Virginia State Bar No. 41058

11 Attorney for Plaintiff
12 *(Pro Hac Vice Application Filed)*
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Exhibit 1

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

Motion and Order for Admission Pro Hac Vice

Division	Brownsville	Case Number	Case No. 1:14-cv-254
STATE OF TEXAS, et al.			
versus			
UNITED STATES OF AMERICA, et al.			

United States District Court
Southern District of Texas
FILED

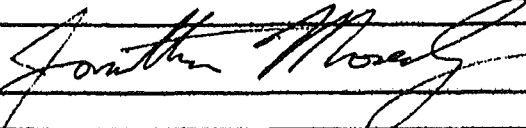
JAN 15 2015

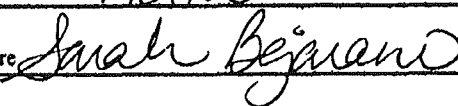
David J. Bradley, Clerk of Court

Lawyer's Name Firm Street City & Zip Code Telephone & Email Licensed: State & Number Federal Bar & Number	Jonathon A. Moseley, Esq. Freedom Watch, Inc. 2020 Pennsylvania Avenue N.W., Suite 345 Washington, D.C. 20006 Virginia State Bar #41058 U.S. District Court for the Eastern District of Virginia
---	---

Name of party applicant seeks to appear for:	Amicus Curiae, Sheriff Joe Arpaio
--	-----------------------------------

Has applicant been sanctioned by any bar association or court? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
On a separate sheet for each sanction, please supply the full particulars.

Dated: 1/14/2015	Signed: 
------------------	--

The state bar reports that the applicant's status is: Active	
Dated: 1-15-15	Clerk's signature: 

United States District Court
Southern District of Texas
ENTERED

Order

This lawyer is admitted *pro hac vice*.

JAN 16 2015

Dated: 1/16/15


 David J. Bradley, Clerk of Court
 United States District Judge

Exhibit 2

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

United States District Court
Southern District of Texas
ENTERED

JAN 21 2015

STATE OF TEXAS, *et al.*

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*

Defendants

David J. Bradley, Clerk of Court

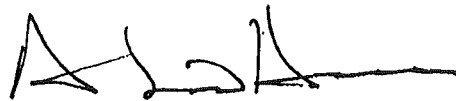
Case No. 1:14-cv-254

**ORDER GRANTING MOTION FOR LEAVE TO PARTICIPATE AS
AMICI CURIAE IN SUPPORT OF PLAINTIFFS BY SHERIFF JOE ARPAIO**

Before the Court is a Motion for Leave to Participate as *Amicus Curiae* in Support of Plaintiffs by Sheriff Joe Arpaio, elected Sheriff of Maricopa County, Arizona.

The Court hereby grants leave for the aforementioned movant to participate as *Amicus Curiae* and file a brief in support of Plaintiffs' motion for a preliminary injunction which the Court may consider in assisting the Court evaluating the issues in the case.

Signed this 21st day of July, 2015.



Hon. Andrew S. Hanen
United States District Judge

Exhibit 3

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

MANUEL de JESUS ORTEGA MELENDRES, et. al.

Plaintiff(s)/Petitioner(s),

vs.

CASE NO: CV-07-2513-PHX-GMS

JOSEPH M. ARPAIO, et. al.

Defendant(s)/Respondent(s)

Application of Attorney For Admission To Practice Pro Hac
Vice Pursuant to LRCiv 83.1(b)(2)**NOTICE: \$35.00 APPLICATION FEE REQUIRED!**

I, Jonathon Alden Moseley, hereby apply to the Court under LRCiv 83.1(b)(2) for pro hac vice admission to appear and practice in this action on behalf of Dennis L. Montgomery, witness and proposed intervenor

City and State of Principal Residence: Lake Placid, Florida, temporarily working in Springfield, Virginia
 Firm Name: Freedom Watch, Inc.
 Address: 2020 Pennsylvania Ave, N.W., Suite 345 Suite: 15-287
 City: Washington State: D.C. Zip: 20006
 Firm/Business Phone: (310) 595-0800
 Firm Fax Phone: (703) 788-0449 E-mail Address: Contact@JonMoseley.com

I am admitted to practice before the following courts. (attach additional sheets if necessary)

TITLE OF COURT	DATE OF ADMISSION	IN GOOD STANDING?
Supreme Court of Virginia, including all Virginia courts	06/01/1997	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*
U.S. District Court for the Eastern District of Virginia	08/20/2010	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*
		<input type="checkbox"/> Yes <input type="checkbox"/> No*

* Explain:

(An **Original** Certificate of Good Standing from a **FEDERAL BAR** in which an applicant has been admitted dated no more than 45 days prior to submission of this application is required.)

I have concurrently, or within 1 year of this application, made *pro hac vice* applications to this Court in the following actions (attach additional sheets if necessary):

Case Number	Title of Action	Date Granted or Denied*

* Explain:

ALL APPLICANTS ARE REQUIRED TO ANSWER THE FOLLOWING QUESTIONS.

If you answer YES to either of the following questions, please explain all circumstances on a separate page.

Are you currently the subject of a disciplinary investigation or proceeding by any Bar or Court? ☐ Yes ☒ No
 Have you ever been disbarred from practice in any Court? ☐ Yes ☒ No

I declare under penalty of perjury that the foregoing is true and correct; that I am not a student of, nor am I regularly employed, engaged in business, professional or other activities in the State of Arizona; and that I am not currently suspended, disbarred or subject to disciplinary proceedings in any court. I certify that I have read and will adhere to the Standards for Professional Conduct, will comply with the Rules of Practice of the United States District Court for the District of Arizona ("Local Rules"), and will subscribe to receive court notices as required by LRCiv 83.1(c).

Jonathon A. Moseley
 Date May 2, 2015 Signature of Applicant
 Fee Receipt # _____

(Rev. 04/12)

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

MANUEL de JESUS ORTEGA MELENDRES, et. al.

Plaintiff(s)/Petitioner(s),
vs.

JOSEPH M. ARPAIO, et. al.

Defendant(s)/Respondent(s)

CASE NO: CV-07-2513-PHX-GMS

Application of Attorney For Admission To Practice Pro Hac
Vice Pursuant to LRCiv 83.1(b)(2)

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City and State of Principal Residence: Lake Placid, Florida, temporarily working in Springfield, Virginia
 Firm Name: Klayman Law Firm
 Address: 7050 West Palmetto Park Road Suite: 15-287
 City: Boca Raton State: Florida Zip: 33433
 Firm/Business Phone: (310) 595-0800
 Firm Fax Phone: (703) 783-0449 E-mail Address: Contact@JonMoseley.com

I am admitted to practice before the following courts. (attach additional sheets if necessary)

TITLE OF COURT	DATE OF ADMISSION	IN GOOD STANDING?
Supreme Court of Virginia, including all Virginia courts	06/01/1997	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No*
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		<input type="checkbox"/> Yes <input type="checkbox"/> No*

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Date

Fee Receipt #

Signature of Applicant

(Rev. 04/12)