

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

MICHAEL E. MANN, PhD)	
Pennsylvania State University)	
Department of Meteorology)	
University Park, PA 16802)	Case No.: 2012 CA 008263B
)	
Plaintiff,)	Judge: Frederick H. Weisberg
)	
v.)	Next Scheduled Event: None
)	
NATIONAL REVIEW, INC.)	
215 Lexington Avenue)	
New York, NY 10016,)	
)	
- and -)	
)	
COMPETITIVE ENTERPRISE INSTITUTE)	
1899 L Street, NW)	
Washington, DC 20036)	
)	
- and -)	
)	
RAND SIMBERG)	
c/o Competitive Enterprise Institute)	
1899 L Street, NW)	
Washington, DC 20036)	
)	
- and -)	
)	
MARK STEYN)	
Box 30)	
Woodsville, NH 03784)	
)	
Defendants.)	

MOTION FOR ADMISSION *PRO HAC VICE* FOR MARK PLATT

Michael J. Songer, a member of the Bar of this Court and attorney for Defendant Mark Steyn, respectfully moves that Mark Platt be admitted *pro hac vice* as counsel for Mark Steyn in the above-captioned matter. Attached in support of this motion are: (1) Application for

Admission *Pro Hac Vice* of Mark Platt; (2) Declaration of Mark Platt; (3) Praeceptum of Appearance for Mark Platt; (4) Receipt from Committee on Unauthorized Practice of Law; and (5) a Proposed Order.

Dated: March 24, 2014

Respectfully submitted,

/s/ Michael J. Songer
Michael J. Songer (D.C. Bar No.: 453727)
Crowell & Moring LLP
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595
Telephone: (202) 624-2990
Facsimile: (202) 628-5116
Email: msonger@crowell.com
Counsel for Defendant Mark Steyn

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Motion for Admission *Pro Hac Vice* for Mark Platt and accompanying documents were served by electronic means through CaseFileXpress filing system, concurrent with the filing of this document on this 24th day of March, 2014, to:

By CaseFileXpress E-service:

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Bernard S. Grimm
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Counsel for National Review, Inc.

Bruce D. Brown
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1050 Connecticut Avenue, N.W.
Washington, DC 20036-5304

Counsel for Competitive Enterprise Institute and Rand Simberg

/s/ Michael J. Songer

Form 8. Application for Admission Pro Hac Vice.

DISTRICT OF COLUMBIA
COURT OF APPEALS

[or]

SUPERIOR COURT OF
THE DISTRICT OF COLUMBIA

<u>MICHAEL E MANN, PHD</u> ,)	
Plaintiff/Appellant,)	APPLICATION FOR ADMISSION
v.)	PRO HAC VICE
<u>NATIONAL REVIEW, ET AL.</u> ,)	Case No. <u>2012 CA 008263 B</u>
Defendant/Appellee.)	
<u>NATIONAL REVIEW, ET AL.</u>)	

I declare under penalty of perjury:

- (1) That I have not applied for admission pro hac vice in more than five cases in courts of the District of Columbia this calendar year;
- (2) That I am a member in good standing of the highest court(s) of the State(s) of New York;
(state all states)
- (3) That there are no disciplinary complaints pending against me for violation of the rules of the courts of those states;
- (4) That I have not been suspended or disbarred for disciplinary reasons from practice in any court;
- (5) That I am associated with _____
Michael Songer (D.C. Bar No. 453727) of the firm of Crowell & Moring

(name the D.C. Bar member under Super. Ct. Civ. R. 101;
and give his/her D.C. Bar Number)
- (6) That I do not practice or hold out to practice law in the District of Columbia; and

(7) That I have read all of the rules of the relevant division of the Superior Court of the District of Columbia and the District of Columbia Court of Appeals, and have complied fully with District of Columbia Court of Appeals Rule 49 and, as applicable, Super. Ct. Civ. R. 101. The reason(s) I am applying for admission pro hac vice are as follows:
To assist in the representation of defendant Mark Steyn in
connect with the within proceeding

I acknowledge the jurisdiction of the courts of the District of Columbia over my professional conduct, and I agree to be bound by the District of Columbia Court of Appeals Rules of Professional Conduct, in this matter, if I am admitted pro hac vice. I have applied for admission pro hac vice in the courts of the District of Columbia 0 times previously in this calendar year.

I attach hereto the receipt issued by the District of Columbia Court of Appeals Committee on the Unauthorized Practice of law as proof of my prior payment of the pro hac vice fee.



Signature

Mark Platt

Print Name

March 20, 2014

Date

Kornstein Veisz Wexler & Pollard, LLP

757 Third Avenue

New York, New York 10017

Address

(212) 418-8600

Telephone Number

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

MICHAEL E MANN, PhD)
Pennsylvania State University)
Department of Meteorology)
University Park, PA 16802)

Plaintiff,)

v)

NATIONAL REVIEW, INC)
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New York, NY 10016,)

- and -)

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1899 L Street, NW)
Washington, DC 20036,)

- and -)

RAND SIMBERG)
c/o Competitive Enterprise)
Institute)
1899 L Street, NW)
Washington, DC 20036,)

- and -)

MARK STEYN,)
Box 30)
Woodsville, NH 03785)

Defendants.)

Case No 2012 CA
008263 B

Judge: Frederick H
Weisberg

DECLARATION OF MARK PLATT

I, MARK PLATT, declare under penalty of perjury:

1. I have not applied for admission *pro hac vice* in more than five cases in courts of the District of Columbia this calendar year.
2. I am a member in good standing of the following Courts: New York; United States Supreme Court, Second Circuit Court of Appeals, United States District Courts for the Southern and Eastern Districts of New York.
3. There are no disciplinary complaints against me for violation of the rules of the Courts set forth in paragraph 2 of this Declaration.
4. I have not been suspended or disbarred for disciplinary reasons from practice in any court, or resigned with charges pending in any jurisdiction or court.
5. I am associated with Michael J. Songer, D.C. Bar No. 453727, of the firm Crowell & Moring, 1001 Pennsylvania Ave., NW, Washington DC 20004, under D.C. Superior Ct. Civ. R. 101.
6. I do not practice or hold out to practice law in the District of Columbia. I have never applied for admission to the D.C. Bar, and thus have not had an application for admission to the D.C. bar denied.
7. I have read all the rules of the relevant division of the Superior Court of the District of Columbia and the District of Columbia Court of Appeals, and have complied fully with District of Columbia Court of Appeals Rule 49 and D.C. Superior Ct. Civ. R. 101. The reasons I am applying *pro hac vice* are as follows: Crowell & Moring represents Defendant Mark Steyn in the above-captioned matter. To assist in the representation of Mark Steyn in this matter, I respectfully seek admission *pro hac vice* to the District of Columbia Bar.

8. I acknowledge the jurisdiction of the Courts of the District of Columbia over my professional conduct, and I agree to be bound by the District of Columbia Court of Appeals Rules of Professional Conduct if I am admitted *pro hac vice*. I agree to promptly notify the Court if, during the course of the above-captioned proceedings, I am suspended or disbarred for disciplinary reasons, or if I resign with charges pending in any jurisdiction or court to which I am admitted.

9. I attach hereto the receipt issued by the District of Columbia Court of Appeals Committee on the Unauthorized Practice of Law as proof of my prior payment of the *pro hac vice* fee.

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

Respectfully Submitted



Mark Platt

Executed on March 21, 2014

KORNSTEIN VEISZ WEXLER &
POLLARD, LLP
757 Third Avenue
New York, New York 10017
(212) 418-8600

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

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MARK STEYN)	
Box 30)	
Woodsville, NH 03784)	
)	
Defendants.)	

PRAECIPE TO ENTER APPEARANCE

Please take notice that the undersigned hereby request permission of this Court for Mark Platt to appear and participate, *pro hac vice*, as counsel for Defendant, Mark Steyn. Pursuant to

Rule 101 of the Superior Court Rules of Civil Procedure, in support of this request the undersigned aver as follows:

1. Mark Platt's address and telephone number are:

757 Third Avenue
New York, NY 10017
(212) 418-8603

2. Mark Platt is a member of the New York State Bar.
3. Mark Platt has not previously sought to appear pursuant to Rule 101.

Michael J. Songer, a member in good standing of the District of Columbia Bar and counsel of record in the above-captioned matter, joins in this Praecipe.

Dated: March 24, 2014

Respectfully submitted,

/s/ Mark Platt

Mark Platt (*pro hac vice motion pending*)
Kornstein Veisz Wexler & Pollard, LLP
757 Third Avenue
New York, NY 10017
Telephone: (212) 418-8603
Facsimile: (212) 826-3640
Email: mplatt@kvvmail.com

/s/ Michael J. Songer

Michael J. Songer (D.C. Bar No.: 453727)
Mark Platt
(*pro hac vice motion pending*)
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Facsimile: (202) 628-5116
Email: msonger@crowell.com
Counsel for Defendant Mark Steyn

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a copy of the foregoing Praecipe of Appearance was served by electronic means through CaseFileXpress filing system, concurrent with the filing of this document on this 24th day of March, 2014, to:

By CaseFileXpress E-service:

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Counsel for Plaintiff

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Counsel for National Review, Inc.

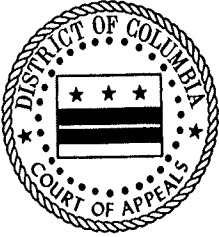
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Counsel for Competitive Enterprise Institute and Rand Simberg

By United States Mail:

District of Columbia Court of Appeals' Committee on Unauthorized Practice
Historic Courthouse
430 E Street N.W.
Washington, DC 20001

/s/ Michael J. Songer



District of Columbia Court of Appeals
Committee on Unauthorized Practice of Law
430 E Street, N.W. - Room 123
Washington, D.C. 20001
202 / 879-2777

R E C E I P T

APPLICATION TO APPEAR *PRO HAC VICE*

Of Mark Platt
Name of Attorney

Case No. 2012 CA 008263B
Michael E. Mann PhD vs National Review, et al

The District of Columbia Court of Appeals Committee on Unauthorized Practice of Law, in accordance with the provisions of D.C. App. Rule 49(c)(7), has received a copy of the application to appear *pro hac vice* and the required filing fee. As of this date, the Committee's records indicate that the attorney has not applied for admission *pro hac vice* in more than five (5) cases in the courts of the District of Columbia this calendar year.

03/24/2014
Date

A handwritten signature in black ink, appearing to read "Brandon K. ...", is written over a horizontal line.

for the
Committee on Unauthorized Practice of Law
Room 123 - 202/879-2777

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CIVIL DIVISION

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Defendants.)	

[PROPOSED] ORDER

Upon consideration of the Motion for Admission *Pro Hac Vice* for Mark Platt,

It is on this ___ day of _____, 2014, hereby

ORDERED, that the Motion is **GRANTED**.

SO ORDERED.

Frederick H. Weisberg
JUDGE
(Signed in Chambers)

COPIES TO:

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