

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

In re: The Matter of the 2016 Presidential Election :  
: Docket No. 659-MD-2016  
:  
: ELECTION MATTER

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**MOTION FOR ADMISSION *PRO HAC VICE***

Lawrence J. Tabas, Esquire, hereby moves that David M. Morrell be admitted to appear and practice in this Court as counsel for the President-Elect Donald J. Trump, Vice-President-Elect Michael Pence, and Donald J. Trump for President, Inc. in the above-captioned matter as counsel *pro hac vice* pursuant to Pa. R.C.P. No. 1012.1

The undersigned counsel, Lawrence J. Tabas, Esquire, is a Partner with the law firm of Obermayer Rebmann Maxwell & Hippel LLP, and is admitted to practice in this Court and therefore makes the instant Motion.

In support of this Motion, undersigned counsel attaches the Verification for Admission *pro hac vice* of David M. Morrell, filed herewith as Exhibit "A," which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

The submission of the appropriate form and payment of the required \$375.00 admission fee to the Pennsylvania IOLTA Board has been accomplished on behalf of David M. Morrell. See certification and acknowledgement attached as Exhibit "B."

In support of this Motion, undersigned counsel attaches a Verification for Admission *pro hac vice* of David M. Morrell by Lawrence J. Tabas, filed herewith as Exhibit "C," which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

Respectfully Submitted:

OBERMAYER REBMANN MAXWELL &  
HIPPEL LLP

/s/ Lawrence J. Tabas

Lawrence J. Tabas, I.D. No. 27815

OBERMAYER REBMANN MAXWELL &  
HIPPEL LLP

Centre Square West

1500 Market Street, Suite 3400

Philadelphia, PA 19102

Phone: 215-665-3158

lawrence.tabas@obermayer.com

# EXHIBIT A

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

In re: The Matter of the 2016 Presidential Election :  
: Docket No. 659-MD-2016  
:  
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**VERIFICATION**

I, David M. Morrell, am a member in good standing of the Bar of the following courts:

<b><u>Jurisdiction</u></b>	<b><u>Date Admitted</u></b>	<b><u>Bar No.</u></b>
District of Columbia	April 1, 2013	1013411
Texas	May 5, 2014	24090277
California (inactive)	Sept. 2, 2011	277559
U.S. Supreme Court	Nov. 28, 2016	300036
U.S. Court of Appeals for the Fifth Circuit	Sept. 9, 2011	
U.S. Court of Appeals for the Sixth Circuit	Mar. 27, 2014	
U.S. Court of Appeals for the Second Circuit	Aug. 7, 2015	
U.S. Court of Appeals for the Ninth Circuit	Sept. 19, 2016	
U.S. District Court for the District of D.C.	Feb. 12, 2016	

I do not currently have, nor have I ever had, any disciplinary proceedings pending against me in any Federal or State Court, nor have I ever been reprimanded, suspended, or disbarred from the practice of law. I have no pending

disciplinary complaints as to which a finding has been made that the complaint should proceed to a hearing.

I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice when facing a disciplinary complaint before this Court or any other court.

I have not applied for *pro hac vice* admission in any other pending actions in Pennsylvania. Previously, I have applied for *pro hac vice* admission in no actions in Pennsylvania, and I have never had an application for admission denied. I am requesting *pro hac vice* admission in the Commonwealth Court of Pennsylvania in the following matter: In re: The Matter of the 2016 Presidential Election, Docket No. 659-MD-2016 (the “Case”).

I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

I shall submit to the jurisdiction of the Pennsylvania Courts and the Pennsylvania Disciplinary Board with respect to acts or omissions occurring during the appearance in the Case.

I consent to the appointment of Lawrence J. Tabas as the agent upon whom service of process shall be made for all actions, including disciplinary actions that may arise out of the practice of law in the Case.

Respectfully Submitted:

*/s David M. Morrell*

\_\_\_\_\_  
David M. Morrell

JONES DAY

51 Louisiana Avenue, N.W.

Washington, DC 20001

Phone: 202-879-3717

Email: [dmorrell@jonesday.com](mailto:dmorrell@jonesday.com)

## **EXHIBIT B**

**CERTIFICATION OF FEE PAYMENT AND REQUIRED INFORMATION  
TO PENNSYLVANIA INTEREST ON LAWYERS TRUST ACCOUNT  
BOARD (IOLTA BOARD)**

This shall serve as the fee payment certification and required information certification referenced in 204 Pa. Code § 81.503; 231 Pa. Code § 1012.1(b).

I hereby certify that the \$375.00 fee required by 204 Pa. Code § 81.505(a) has been paid in the case of In re: The Matter of the 2016 Presidential Election, Docket No. 659-MD-2016, filed in the Commonwealth Court of Pennsylvania. A copy of the fee payment certification from the IOLTA Board is attached hereto.

I hereby certify that the information required by 204 Pa. Code § 81.504 has been provided to the Pennsylvania IOLTA Board.





SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

December 01, 2016

DAVID MICHAEL MORRELL, Esq.  
JONES DAY  
51 LOUISIANA AVENUE, N.W.  
WASHINGTON, DC 20001

SENT TO DAVID M. MORRELL VIA Email: [erica.woebse@obermayer.com](mailto:erica.woebse@obermayer.com)

Dear Attorney MORRELL:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as In Re: Matter of the 2016 Presidential Election, no. 659 M.D. 2016, filed in the Commonwealth Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart  
Executive Director

cc: LAWRENCE J. TABAS, Esq.  
[lawrence.tabas@obermayer.com](mailto:lawrence.tabas@obermayer.com)

Pennsylvania Judicial Center  
601 Commonwealth Ave., Ste. 2400  
PO Box 62445, Harrisburg, PA 17106-2445  
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX  
[paiolta@pacourts.us](mailto:paiolta@pacourts.us) · [www.paiolta.org](http://www.paiolta.org)

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program

## **EXHIBIT C**

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

In re: The Matter of the 2016	:	
Presidential Election	:	Docket No. 659-MD-2016
	:	
	:	ELECTION MATTER

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**VERIFICATION**

I, Lawrence J. Tabas, Esquire, certify and affirm that after reasonable investigation, I reasonably believe that David M. Morrell, Esquire is a reputable and competent attorney, and I am in a position to recommend this candidate for *pro hac vice* admission for practice in the Commonwealth Court of Pennsylvania.

I am a sponsor of candidate Chad A. Readler, Esquire for admission *pro hac vice* in the Commonwealth Court of Pennsylvania, and a Motion for Admission *Pro Hac Vice* is currently pending on his behalf.

If applicable at the conclusion of this matter, I affirm that the proceeds from any settlement related to this cause of action in which David M. Morrell, Esquire is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including IOLTA provisions thereof.

Respectfully Submitted:

/s/ Lawrence J. Tabas

Lawrence J. Tabas, I.D. No. 27815

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