

IN THE COMMONWEALTH COURT OF PENNSYLVANIA  
HARRISBURG, PENNSYLVANIA

In re: The Matter of the 2016 Presidential Election  
  
ELECTION MATTER

Docket No. 659-MD-2016

**MOTION FOR PRO HAC VICE ADMISSION OF ANDREW G. CELLI, JR.**

PLEASE TAKE NOTICE that upon the annexed Verification of Andrew G. Celli, Jr., and the annexed Verification of Lawrence M. Otter, the undersigned hereby moves that Andrew G. Celli, Jr. be admitted to appear and practice in this Court as counsel for Jill Stein, the Jill Stein for President Campaign, and Petitioners Randall Reitz, Cindy Joy Marselis, Jennifer Tharp, Joanne Tosti-Vasey, Mary Vollerero, Irwin Schwartz, and Jean G. Schwartz, in the above-captioned matter pursuant to Pa. R.C.P. No. 1012.1.

The undersigned counsel is admitted to practice in this Court and therefore makes the instant Motion.

The submission of the appropriate form and payment of the required admission fee to the Pennsylvania IOLTA Board has been accomplished on behalf of Andrew G. Celli, Jr.

Respectfully submitted,

/s/ LAWRENCE M. OTTER, ESQ.

LAWRENCE M. OTTER, ESQUIRE  
ATTORNEY FOR PETITIONERS  
PA ATTORNEY ID 31383  
PO Box 575  
SILVERDALE, PA 18901  
267-261-2984  
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IN THE COMMONWEALTH COURT OF PENNSYLVANIA  
HARRISBURG, PENNSYLVANIA

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

**VERIFICATION OF SPONSORING ATTORNEY**

I, Lawrence M. Otter, Esq., certify and affirm that after reasonable investigation, I reasonably believe that Andrew G. Celli, Jr. 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.

I am currently a sponsor of one other attorney for admission *pro hac vice* in cases in all courts of record in the Commonwealth of Pennsylvania.

If applicable at the conclusion of this matter, I affirm that the proceeds from any settlement related to this cause of action in which Andrew G. Celli, Jr. is granted *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 the IOLTA provisions thereof.

**[Continued on next page]**

**VERIFICATION**

I, Lawrence M. Otter, Esq, hereby state that the facts above set forth are true and correct or are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

/s/ Lawrence M. Otter, Esq.

Date: December 1, 2016

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LAWRENCE M. OTTER, ESQ.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA  
HARRISBURG, PENNSYLVANIA

In re: The Matter of the 2016 Presidential Election  
ELECTION MATTER

Docket No. 659-MD-2016

**VERIFICATION OF ANDREW G. CELLI, JR.**

I, Andrew G. Celli, Jr., am a member in good standing of the Bar of the following courts:

<b><u>Jurisdiction</u></b>	<b><u>Year Admitted</u></b>	<b><u>Bar Number</u></b>
New York	1991	
U.S. District Court, Eastern District of New York	1992	
U.S. District Court, Southern District of New York	1992	
U.S. Supreme Court	1996	
U.S. Court of Appeals, Second Circuit	1999	
U.S. District Court, District of Maryland	2006	
U.S. District Court, Middle District of Florida	2007	
U.S. Court of Appeals, Sixth Circuit	2009	
U.S. Bankruptcy Court, Southern District of New York	2010	
U.S. Court of Appeals, D.C. Circuit	2013	

I do not have, nor have I ever had, any disciplinary proceedings pending against me in any Federal or State Court, nor have I ever been disciplined, 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 applied for *pro hac vice* admission in any other cases in Pennsylvania.

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 during my appearance in this matter.

I consent to the appointment of the sponsoring attorney, Lawrence Otter, 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 Cases.

\* \* \*

**VERIFICATION**

I, Andrew G. Celli, Jr., hereby state that the facts above set forth are true and correct or are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: December 1, 2016  
Philadelphia, PA

  
ANDREW G. CELLI, JR.

DENISE EDWARDS  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01ED6344734  
Qualified in Nassau County  
My Commission Expires 07-11-2020





SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

December 01, 2016

ANDREW G CELLI, Esq.  
EMERY CELLI BRINCKERHOFF & ABADY, LLP  
600 FIFTH AVENUE, 10TH FLOOR  
NEW YORK, NY 10020

SENT TO DENISE EDWARDS VIA Email: DEDWARDS@ECBALAW.COM

Dear Attorney CELLI:

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: the Matter of the 2016 Presidential Election, no. 659-MD-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 M. OTTER, Esq.

LarryOtter@hotmail.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 · www.paiolta.org

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