

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civil # 01: 08-cv-1345 (RMC)

8 GILCREASE LANE QUINCY,
FLORIDA 32351, et al.,

Defendants.

**MOTION TO ALLOW ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
PERMISSION TO PRACTICE IN THIS CASE ONLY**

Charles A. Murray, Esquire, moves this Court for permission to allow Michael R.N. McDonnell, who is not a member of this Court, to practice before this Court in this case only, and in support thereof states:

1. That the Movant has been retained by Defendants, to provide legal representation in connection with the above-entitled case now pending before this Court.
2. That Michael R.N. McDonnell, Esquire, has also been retained by Defendants to provide legal representation in connection with the above-entitled case now pending before this Court.
3. The following accurately represents the names and addresses of each party in this matter:

NAME	ADDRESS
William R. Cowden Jeffrey A. Taylor Vasu B. Muthyala Assistant United States Attorneys Counsel for the Plaintiff	Asset Forfeiture Unit 555 4 th Street N.W. Washington, DC, 20530

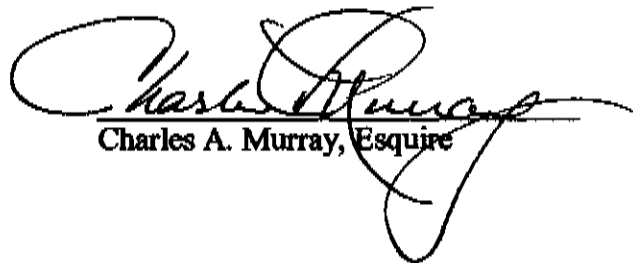
Charles A. Murray, Esq.
Counsel for the Defendant

27911 Crown Lake Blvd., Suite 223
Bonita Springs, Florida 34135-4218

4. The Affidavit of Michael R.N. McDonnell is attached hereto and incorporated herein in support of this motion.

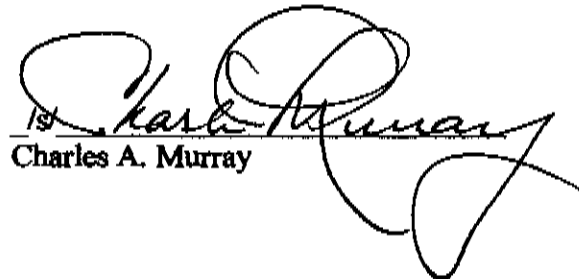
WHEREFORE, Movant respectfully requests that Michael R.N. McDonnell be admitted to practice in the above-entitled court FOR THE PURPOSES OF THIS MATTER ONLY.

Dated this 30th day of September, 2009.


Charles A. Murray, Esquire

CERTIFICATE OF SERVICE

I hereby certify that I caused a copy of the foregoing Motion to be served by means of the Court's ECF system on this 1st day of October, 2009, upon all counsel of record.


Charles A. Murray

AFFIDAVIT OF MICHAEL R.N. MCDONNELL

STATE OF FLORIDA)
) SS
COUNTY OF COLLIER)

BEFORE ME, the undersigned authority, personally appeared Michael R.N. McDonnell, who after being first duly cautioned and sworn states:

1. My name is Michael R.N. McDonnell. I am a licensed attorney at law and a member of the law firm of McDonnell Trial Law, with offices at Suite 501, 5150 Tamiami Trail North, Naples, Florida 34103. Phone: (239) 434-7711. My Florida Bar Number is 124032.

2. I have been retained as a member of the above law firm by Defendants regarding the instant litigation now pending before this Court.

3. That since 1970, I have been and presently am a member of good standing of the bar of the highest court of the State of Florida, where I regularly practice law.

4. I have also been admitted to practice before the following Courts, in all of which I am presently a member in good standing:

COURT	DATE
Supreme Court of the State of Florida	1970
United States District Court – Middle District of Florida	1977
United States District Court – Northern District of Florida	1978
United States District Court – Southern District of Florida	1975
United States Court of Appeals for the 11 th Circuit	1980
Supreme Court of the United States	1975

5. I am not currently, nor have I ever been, subject to any disbarment proceedings.

6. I am not presently, nor have I ever been subject to any suspension proceedings.

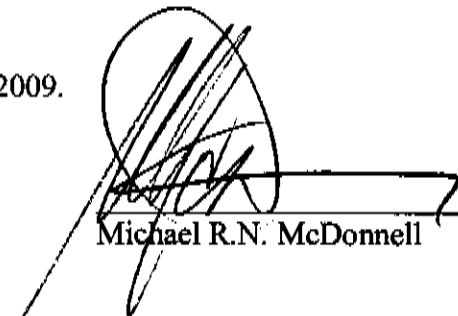
7. I have never had any certificate of privilege to appeal and practice before any regulatory administrative body suspended or revoked.

8. I have never, either by resignation, withdrawal, or otherwise, terminated or attempted to terminate my office as an attorney in order to avoid administrative disciplinary, disbarment or suspension proceedings.

9. I have filed applications to appear as counsel during the past four (4) years in the following matters: NONE

10. If allowed to practice, I agree to comply with the provisions of the Local Rules And further Affiant sayeth naught.

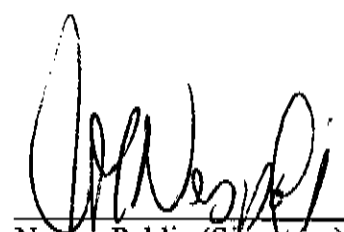
DATED this 30TH day of September 2009.


Michael R.N. McDonnell

STATE OF FLORIDA
COUNTY OF COLLIER

SUBSCRIBED and SWORN to (or affirmed) before me by Michael R.N. McDonnell, this 30th day of September, 2009.

X Personally known to me
Produced identification
Type if ID _____


Notary Public (Signature)
Notary Public (Seal)

