

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

REPUBLIC OF PERU,)	
)	
Plaintiff,)	
)	Case No. 1:08-cv-02109 (HHK)
v.)	
)	
YALE UNIVERSITY,)	
)	
Defendant.)	

**MOTION FOR ADMISSION *PRO HAC VICE*
OF JONATHAN M. FREIMAN**

Defendant in the above-captioned matter files this motion pursuant to Rule 83.2 of the Local Civil Rules of the United States District Court for the District of Columbia for the *pro hac vice* admission of Jonathan M. Freiman and in support thereof states as follows:

1. Jonathan M. Freiman is a partner at the law firm of Wiggin and Dana LLP. Mr. Freiman’s office is located at One Century Tower, P.O. Box 1832, New Haven, Connecticut 06508-1832. His telephone number is (203) 498-4400, his fax number is (203) 782-2889, and his e-mail address is jfreiman@wiggin.com. *See* Exhibit A.

2. Mr. Freiman is a member in good standing of the Bar of the States of Connecticut and Pennsylvania, the United States Supreme Court, the United States Courts of Appeals for the First, Second, Third, Fourth, Ninth and D.C. Circuits, and the United States District Court for the District of Connecticut. Mr. Freiman has not been denied admission to, nor been disciplined by, any Court. *See* Exhibit A.

3. Defendant Yale University retained Mr. Freiman in 2005 to advise it in connection with this matter, and now that Plaintiff Republic of Peru has chosen to file suit, seeks to have Mr. Freiman defend it in this suit. *See* Exhibit A.

4. Mr. Freiman has not been admitted *pro hac vice* in this Court within the last two years. *See* Exhibit A.

5. Defendant respectfully requests that this motion be granted so that Mr. Freiman may attend and participate in all matters on behalf of Defendant and otherwise engage in pre-trial, trial and post-trial proceedings in connection with this litigation.

6. This motion is made by Jeffrey R. Babbin, who is a member in good standing of this Bar.

7. Plaintiff consents to this motion.

WHEREFORE, Defendant respectfully requests that this Court enter an Order granting its motion and admitting Jonathan M. Freiman *pro hac vice* for the purpose of representing Defendant in this matter.

Respectfully submitted,

Date: January 21, 2009

/s/Jeffrey R. Babbin
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