

**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 R. SCOTT GREATHEAD**

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 R. Scott Greathead and in support thereof states as follows:

1. R. Scott Greathead is a partner at the law firm of Wiggin and Dana LLP. Mr. Greathead’s office is located at 450 Lexington Avenue, Suite 3800, New York, New York 10017. His telephone number is (212) 490-1700, his fax number is (212) 490-0536, and his e-mail address is sgreathead@wiggin.com. *See* Exhibit A.

2. Mr. Greathead is a member in good standing of the Bar of the State of New York, the United States Courts of Appeals for the Second and Third Circuits, and the United States District Courts for the Southern and Eastern Districts of New York. Mr. Greathead has not been denied admission to, nor been disciplined by, any Court. *See* Exhibit A.

3. Defendant Yale University retained Mr. Greathead 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. Greathead defend it in this suit. *See* Exhibit A.

4. Mr. Greathead 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. Greathead 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 R. Scott Greathead *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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