

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

CABLE NEWS NETWORK, INC. and ABILIO  
JAMES ACOSTA,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States; JOHN F. KELLY,  
in his official capacity as Chief of Staff to the  
President of the United States; WILLIAM  
SHINE, in his official capacity as Deputy Chief  
of Staff to the President of the United States;  
SARAH HUCKABEE SANDERS, in her official  
capacity as Press Secretary to the President of the  
United States; the UNITED STATES SECRET  
SERVICE; RANDOLPH ALLES,  
in his official capacity as Director of the  
United States Secret Service; and JOHN  
DOE, Secret Service Agent, in his official  
capacity,

Defendants.

**Case No. 1:18-cv-02610-TJK**

**MOTION FOR *PRO HAC VICE* ADMISSION OF JONATHAN L. BACKER**

I, Joshua A. Geltzer, hereby move pursuant to Local Civil Rule 83.2(d) for the *pro hac vice* admission of Jonathan L. Backer to the bar of this Court to act as co-counsel in this action.

Jonathan L. Backer is a member in good standing of the New York bar. On the basis of the foregoing and the attached declaration, it is respectfully requested that this Court admit Jonathan L. Backer *pro hac vice* for the purpose of appearing and participating as co-counsel on behalf of Reporters Committee for Freedom of the Press as amicus curiae in this action.

Dated: November 13, 2018

Respectfully submitted,

/s/ Joshua A. Geltzer

JOSHUA A. GELTZER (D.C. Bar  
No. 1018768)

*Counsel of Record for Amicus Curiae*

JONATHAN L. BACKER\*

MARY B. MCCORD

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\* *pro hac vice* motion pending

**CERTIFICATE OF SERVICE**

I hereby certify that on November 13, 2018, I filed this Motion with the United States District Court for the District of Columbia using the CM/ECF system, which will cause it to be served on all counsel of record.

Dated: November 13, 2018

Respectfully submitted,

/s/ Joshua A. Geltzer  
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