

**UNITED STATES DISTRICT COURT - CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

ANDY MARTIN,)
)
 Plaintiff,)
)
 v.)
)
 WASHINGTON POST COMPANY, DANIEL)
 MORSE, SCOTT SHIRLEY, d/b/a ADD)
 PRODUCTION, GOOGLE, INC., JOHN)
 GILCHRIST, a/k/a JOHN BORLAZA, JIM)
 BROSEMER, MONTGOMERY COUNTY,)
 MARYLAND, JOHN J. McCARTHY, JOHN)
 DOE AGENT OF MARK KIRK and/or)
 BARACK HUSSEIN OBAMA, WILLIAM G.)
 SIMMONS, EUGENE WOLFE, CHERYL)
 McCALLY,)
)
 Defendants.)

No. 3:09-cv-03295-JES-BGC
 Magistrate Judge Byron G. Cudmore

**MOTION OF DEFENDANT DANIEL MORSE
 FOR ORDER GRANTING LEAVE TO
DAVID P. SANDERS AND WADE R. THOMSON TO APPEAR PRO HAC VICE**

Defendant Daniel Morse (“Morse”), by his attorneys, moves this Court, pursuant to CDIL-LR 83.05(F), for entry of an order granting leave to David R. Sanders and Wade A. Thomson to appear as his counsel in this action *pro hac vice*. In support of this motion, Morse states as follows:

1. Morse is one of the defendants in this action. He currently is employed by the Washington Post newspaper.
2. Morse has retained David P. Sanders and Wade A. Thomson of the Chicago law firm of Jenner & Block LLP to serve as his lead counsel in this action.
3. Mr. Sanders is a partner with Jenner & Block, where he has practiced since 1974. He is a member in good standing of the bar of the State of Illinois, of the United States Court of

PROOF OF SERVICE

I hereby certify that on December 18, 2009 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: NONE and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:

Andy Martin
30 East Huron St., Suite 4400
Chicago, IL 60611-4723

Andy Martin
P. O. Box 1851
New York, NY 10150

and other named Defendants.

/s/ Donald M. Craven

Donald M. Craven
ARDC #6180492
Donald M. Craven, P.C.
1005 North Seventh Street
Springfield, IL 62702
Phone: 217/544-1777
Facsimile: 217/544-0713
E-Mail: don@cravenlawoffice.com

David P. Sanders (#2452359)
Wade R. Thomson (#6282174)
JENNER & BLOCK LLP
353 North Clark Street
Chicago, IL 60654-3456
Telephone: (312) 222-9350