

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 08-11364-GAO

MASSACHUSETTS BAY  
TRANSPORTATION AUTHORITY,

Plaintiff,

v.

ZACK ANDERSON, RJ RYAN,  
ALESSANDRO CHIESA, and the  
MASSACHUSETTS INSTITUTE OF  
TECHNOLOGY,

Defendants.

**MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Massachusetts Local Rule 83.5.3(b), John Reinstein, Esq., a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, moves for the admission of Marcia Hofmann, a member of the Bar of the State of California, to this Court for the purpose of representing defendants in the above-captioned matter, and states as follows:

1. Marcia Hofmann is counsel at the Electronic Frontier Foundation. Her business address is 454 Shotwell Street, San Francisco, CA 94110. Her telephone number is (415) 436-9333.
2. Marcia Hofmann is a member in good standing of the Bar of the State of California, as evidenced by the Certificate of Good Standing attached hereto as Exhibit A. There are no disciplinary proceedings pending against her as a member of the bar in any jurisdiction. See Affidavit of Marcia Hofmann, attached hereto as Exhibit B.
3. Marcia Hofmann is familiar with the applicable provisions of the Local

Rules of the United States District Court for the District of Massachusetts.

4. John Reinstein, a member of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, will continue to represent defendants if this motion is granted.

5. Pursuant to Local Rule 7.1(a), Defendants have conferred with counsel for the Plaintiff and he has no objection to granting this motion.

WHEREFORE, the defendants respectfully request that Marcia Hofmann be admitted to practice before this Court *pro hac vice* for the purpose of appearing as counsel for defendants in the above referenced proceeding in accordance with the Rules of this Court.

DEFENDANTS ANDERSON, RYAN  
AND CHIESA

By their attorneys,

Dated: August 18, 2008

/s/ John Reinstein

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**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.2(b), I, John Reinstein, hereby certify that this document filed through the ECF system on August 18, 2008 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ John Reinstein  
John Reinstein, Esq.