

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

DR. MARK GEIER and DAVID GEIER)
) Case No. 1:05CV01749
Plaintiffs,) Judge Thomas F. Hogan
)
v.)
)
DEPARTMENT OF HEALTH AND HUMAN)
SERVICES, et. al.)
)
Defendants.)

**CONSENT MOTION FOR SPECIAL ADMISSION
PRO HAC VICE OF PATRICK TERRENCE O'ROURKE**

Defendants, Dr. Sarah Parker and Dr. James Todd, by counsel, move the admission, *pro hac vice* of Patrick Terrance O'Rourke and as grounds states as follows:

1. This is a civil case involving, inter alia, defamation claims alleged by the plaintiffs against several defendants.
2. In connection with the defense of this case, defendants have engaged the undersigned counsel, who is a member of the bar of this court, to be local counsel for defendants Dr. Sarah Parker and Dr. James Todd. Local counsel has been working with defendants' primary counsel, Patrick Terrance O'Rourke in defending this matter. Defendants have requested that Mr. O'Rourke take a lead role in the pre-trial and trial proceedings. Mr. O'Rourke is extremely familiar with the factual and legal issues in this action, and has substantial federal practice experience.
3. Mr. O'Rourke has not been admitted *pro hac vice* in this Court within the last two years.

4. Pursuant to LCvR 83.2(d) an executed Declaration in Support of Application for Admission *Pro Hac Vice* is attached.
6. Counsel has obtained the consent of counsel prior to filing this Motion.

Respectfully submitted,

**ECKERT SEAMANS CHERIN &
MELLOTT, LLC**

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CERTIFICATE OF GOOD FAITH

I hereby certify that pursuant to LCvR 7 that prior to filing this Motion, I conferred with all counsel of record and obtained the consent of counsel to this Motion.

Erica H. Perkins

Erica H. Perkins

MEMORANDUM OF POINTS & AUTHORITIES

1. Federal Rules of Civil Procedure, Rule 7.
2. LCvR 83.2(d).

Erica H. Perkins

Erica H. Perkins

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing **Consent Motion For Special Admission Pro Hac Vice Of Patrick Terrence O'Rourke** was served electronically and sent by first-class postage pre-paid mail, this 28th day of November, 2005

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