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June 4, 2014

State of New York  
Supreme Court, Appellate Division  
Third Judicial Department  
Attn: Clerk's Office/Principal Court Attorney  
P.O. Box 7288, Capitol Station  
Albany, NY 12224-0288

RE: #518336 – Matter of Nonhuman rights Project, Inc. v. Lavery  
MOTION FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF RESPONDENTS  
AND AGAINST ISSUANCE OF WRIT OF HABEAS CORPUS dated May 14, 2014 ("Motion")

ORAL ARGUMENT REQUEST BE ADDED TO PENDING MOTION

Ladies & Gentlemen:

I am writing to respectfully request that the following be considered added to the Motion referenced above: That, should the motion be granted, I be permitted to participate in the oral argument on this appeal.

I believe my participation will be helpful to the Court, given that the Respondent indicated that it will not be filing a response or otherwise participate in this appeal. I am an attorney licensed to practice law in California and in the Second Circuit Federal Court of Appeals. Being that I am not otherwise licensed to practice in New York, I simultaneous applied for admission *pro hac vice* for this purpose. Thank you.

Respectfully submitted,



Bob Kohn

Encl./Affidavit of Service

Cc: ✓ Steven Wise, Esq.  
✓ Elizabeth Stein, Esq.  
Arthur Carl Spring, Esq.  
Patrick C. Lavery  
Diane Lavery