

**SUPREME COURT OF THE STATE OF NEW YORK
APPELLATE DIVISION - THIRD DEPARTMENT**

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In the Matter of a Proceeding under Article 70 of the CPLR
for a Writ of Habeas Corpus,

THE NONHUMAN RIGHTS PROJECT, INC., on
behalf of TOMMY,
Petitioners-Appellants,

**NOTICE OF MOTION
FOR ADMISSION
*PRO HAC VICE***

-against-

PATRICK C. LAVERY, individually and as an officer of
Circle L Trailer Sales, Inc., DIANE LAVERY, and
CIRCLE L TRAILER SALES, INC.,

Respondents-Respondents.

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PLEASE TAKE NOTICE, that upon the annexed affidavit of Steven M. Wise, Esq., sworn to on January 24, 2014, and the papers annexed thereto, the undersigned moves this Court to admit Steven M. Wise, Esq. *pro hac vice* to brief and argue the above-referenced appeal. Attorney Wise is highly qualified and competent in the matters of this case and his assistance is necessary, as set forth in the attached Affidavit. The undersigned is a member in good standing of the New York Bar and shall appear with Attorney Wise on the appeal and shall be the person upon whom all papers in connection with the cause shall be served.

PLEASE TAKE FURTHER NOTICE, that the motion is returnable on February 24, 2014 which is at least 13 days from the date of service of these papers. The Respondents are hereby given notice that the motion will be submitted on the papers and their personal appearance in opposition is neither required nor permitted.

Dated: _____

From: _____

Elizabeth Stein, Esq.
5 Dunhill Road
New Hyde Park, New York 11040
516-747-4726

To: New York State Supreme Court
Appellate Division – Third Department
Clerk’s Office
P.O. Box 7288
Capitol Station
Albany, New York 12224-0288

Patrick Lavery, individually and as an officer of Circle L Trailer Sales, Inc.
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Gloversville, New York 12078
518-661-5038

Diane Lavery
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