

**STATE OF NEW YORK  
SUPREME COURT COUNTY OF NEW YORK**

-----X  
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,

Petitioner,  
-against-

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

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

Index No.:

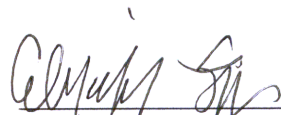
Respondents.  
-----X

PLEASE TAKE NOTICE, that upon the annexed Affidavit of Steven M. Wise, Esq., dated November 19, 2015, his Certificate of Admission of Good Standing, the Affidavit of Elizabeth Stein, Esq. in support of Attorney Wise's admission *pro hac vice* and all other papers annexed thereto, the undersigned moves this Court to admit Steven M. Wise, Esq. *pro hac vice* to brief and argue the above-captioned action. Attorney Wise is highly qualified and competent in the matters of this case and his assistance is necessary, as set forth in his attached Affidavit. He has been admitted *pro hac vice* in the same case brought in the New York Supreme Court, Fulton County and on appeal to the Supreme Court of the State of New York Appellate Division, Third Judicial Department as well as in near-identical cases brought in the New York Supreme Court Counties of New York and Niagara, the Supreme Court of the State of New York Appellate Division, Fourth Judicial Department, and the Court of Appeals in the cases brought on appeal from the decisions of the Third and Fourth Departments. The undersigned is a member in good standing of the New York Bar, shall be the attorney of record in this case and shall

appear with Attorney Wise on the matter 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 at 9:30 A.M. on Monday, December 14, 2015, at the Courthouse located at 60 Centre Street, New York, New York 10007, in the Motion Submission Part Courtroom (Room 130). 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:

  
\_\_\_\_\_  
Elizabeth Stein, Esq.  
Attorney for Petitioner  
5 Dunhill Road  
New Hyde Park, New York 11040  
(516) 747-4726

**TO:**  
PATRICK C. LAVERY, individually and as an officer  
of Circle L Trailer Sales, Inc.  
3032 State Highway 30  
Gloversville, New York 12078  
(518) 661-5038

DIANE LAVERY  
3032 State Highway 30  
Gloversville, New York 12078  
(518) 661-5038

CIRCLE L TRAILER SALES, INC.  
3032 State Highway 30  
Gloversville, New York 12078  
(518) 661-5038

ARTHUR CARL SPRING  
Attorney for Respondents  
10 South Market Street  
Johnstown, New York 12095  
(518) 762-4503