

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-

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

Respondents.
-----X

**Affidavit of Elizabeth Stein, Esq.
in Support of Motion
for Admission of Steven M. Wise
*Pro Hac Vice***

Index No.:

STATE OF NEW YORK }

ss:

COUNTY OF NASSAU }

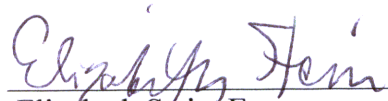
Elizabeth Stein, Esq., being duly sworn, deposes and says:

1. I am an attorney duly admitted to practice in the courts of the State of New York and am the attorney of record for Petitioner, The Nonhuman Rights Project, Inc., (“NhRP”) with respect to the above-captioned matter.
2. I am submitting this affidavit in support of the NhRP’s motion for the admission *pro hac vice* of Steven M. Wise, Esq. to appear and participate in this action on behalf of the NhRP as he is the most qualified lawyer on the matters at issue in the United States.

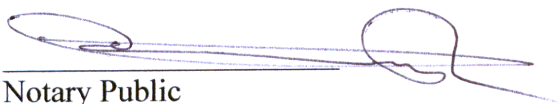
3. Attorney Wise is a member in good standing of the Massachusetts Bar and has been admitted to appear *pro hac vice* with me on the same matter in the New York Supreme Court, Fulton County and the Supreme Court of the State of New York Appellate Division, Third Judicial Department and in near-identical 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 on the appeals taken from the decisions of the Third and Fourth Departments. He also has been admitted to appear in matters *pro hac vice* in Connecticut, New Hampshire, Vermont, Illinois, Florida, Tennessee and Texas.
4. 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.

WHEREFORE, I respectfully pray that the Court grant the NhRP's Notice of Motion for Admission *Pro Hac Vice* of Steven M. Wise, Esq.

Dated: 12/2/2015


Elizabeth Stein, Esq.

Subscribed and Sworn to
before me this
2nd day of December, 2015


Notary Public

PHILIP V. MATHAI
Notary Public, State of New York
Qualified in Nassau County
No. 01MAG206319
My Commission Expires May 18, 2017