IN THE UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

NATIONAL ASSOCIATION OF THEATRE OWNERS; NATIONAL ASSOCIATION OF THEATRE OWNERS OF NEW JERSEY; AMERICAN MULTI-CINEMA, INC.; CINEMARK USA, INC.; REGAL CINEMAS, INC · BIK ENTERTAINMENT INC · BOW

INC.; BJK ENTERTAINMENT, INC.; BOW TIE CINEMAS, LLC; and COMMUNITY

THEATERS LLC,

Plaintiffs,

- against -

PHILIP D. MURPHY, in his official capacity as Governor of New Jersey; and JUDITH PERSICHILLI, in her official capacity as Acting Commissioner of Health of New Jersey,

Defendants.

Case No. 3:20-cv-08298-BRM-TJB

ECF Case

DECLARATION OF GEOFFREY S. BROUNELL IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE FOR JOHN D. FREED

- I, Geoffrey S. Brounell, declare under 28 U.S.C. § 1746 as follows:
- 1. I am a counsel at the law firm Davis Wright Tremaine LLP, attorneys for Plaintiffs National Association of Theatre Owners, National Association of Theatre Owners of New Jersey, American Multi-Cinema, Inc., Cinemark USA, Inc., Regal Cinemas, Inc., BJK Entertainment, Inc., Bow Tie Cinemas, LLC, and Community Theaters LLC (collectively, "Plaintiffs"). I make this declaration on personal knowledge and in support of the application to have John D. Freed admitted *pro hac vice* to make a special appearance on behalf of Plaintiffs in the above-captioned action.

X

2. Since November 2008, I have been a member in good standing of the bar of the State of New Jersey, and since December 2009, I have been a member in good standing of the bar of the United States District Court for the District of New Jersey. No disciplinary proceedings have ever been filed against me in any jurisdiction.

- 3. As set forth in his declaration, Mr. Freed is a member in good standing of the Bars of California and the Ninth Circuit. Plaintiffs asked that Mr. Freed represent them in this matter.
- 4. As further set forth in his declaration, Mr. Freed agrees to abide by the requirements set forth in the Local Civil Rules and such further requirements as the court may impose as a condition of his admission.
- 5. During the course of the representation of Plaintiffs in this matter, I agree to abide by the requirements set forth in the Local Civil Rules, including but not limited to Rule 101.1(c)(4).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 7, 2020 Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: <u>/s/ Geoffrey S. Brounell</u> Geoffrey S. Brounell

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Attorneys for Plaintiffs National Association of Theatre Owners, National Association of Theatre Owners of New Jersey, American Multi-Cinema, Inc., Cinemark USA, Inc., Regal Cinemas, Inc., BJK Entertainment, Inc., Bow Tie Cinemas, LLC, and Community Theaters LLC