## 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.; 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

NOTICE OF MOTION FOR THE ADMISSION OF JOHN D. FREED PRO HAC VICE

PLEASE TAKE NOTICE that the undersigned 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") will move before the Honorable Brian R. Martinotti, United States District Court Judge, District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608 on August 3, 2020, or a date to be assigned by the Court, for an Order granting leave for John D. Freed to make a special appearance as their counsel pro hac vice in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiffs shall rely upon the Declaration of Geoffrey S. Brounell and the Declaration of John D. Freed,

which are submitted herewith, but that no brief is submitted because this motion is addressed to the discretion of the Court pursuant to Local Rule 101.1(c).

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order granting the requested relief is submitted herewith.

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