

**IN THE SUPREME COURT OF FLORIDA**

CASE NO.: SC21-917; SC21-918

Lower Tribunal Nos.: 1D19-2819; 372018CA001509XXXXXX;  
372018CA000882XXXXXX; 372018CA000699XXXXXX

NICOLE "NIKKI" FRIED, ETC.

Petitioner(s),

v.

STATE OF FLORIDA, ET AL.

Respondent(s).

\_\_\_\_\_ /

**VERIFIED MOTION OF JOSEPH S. HARTUNIAN FOR  
ADMISSION TO APPEAR PRO HAC VICE PURSUANT TO  
FLORIDA RULE OF JUDICIAL ADMINISTRATION 2.510**

COMES NOW, Joseph S. Hartunian, Movant herein, and respectfully  
represents the following:

1. Movant is not a resident of the State of Florida.
2. Movant is an attorney at the law firm of Proskauer Rose LLP ("Proskauer"), with offices at: 1001 Pennsylvania Avenue N.W., Suite 600 South, Washington, D.C. 20004, (202) 416-6859.
3. Movant has been retained as an attorney at the above named law firm to represent Dan Daley,<sup>1</sup> Frank C. Ortiz, Rebecca A. Tooley, Justin

\_\_\_\_\_  
<sup>1</sup> The instant action was originally commenced by Commissioner Daley (and others) in his official capacity as Commissioner of the City of Coral Springs, Florida, but, during the pendency of this proceeding, Commissioner Daley no longer holds that office and, thus, his successor is

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Flippen, City of Coral Springs, City of Pembroke Pines, City of Coconut Creek and City of Wilton Manors in the underlying proceeding and Movant now seeks to be admitted in this proceeding through the duration of the appeal.

4. Since 2019, Movant has been and presently is a member in good standing of the bar of the highest court of the State of New York, where Movant regularly practices law, and where his registration number is 5696604.

5. Movant is an active member in good standing and currently eligible to practice law in the following jurisdictions:

<b>JURISDICTION</b>	<b>ADMISSION DATE</b>
STATE OF NEW YORK	2019
DISTRICT OF COLUMBIA	2020
U.D. DISTRICT COURT, NEW YORK, EASTERN DISTRICT	2020
U.S. DISTRICT COURT, NEW YORK, SOUTHERN DISTRICT	2020
U.S. COURT OF APPEALS, SECOND CIRCUIT	2020
U.S. COURT OF APPEALS, FIRST CIRCUIT	2021

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substituted in by operation of law pursuant to Florida Rule of Appellate Procedure 9.360(c)(2).

6. There have been no disciplinary, suspension, disbarment, or contempt proceedings initiated against Movant in the preceding 5 years.

7. Movant, either by resignation, withdrawal, or otherwise, never has terminated or attempted to terminate Movant's office as an attorney in order to avoid administrative, disciplinary, disbarment, or suspension proceedings.

8. Movant is not an inactive member of the Florida Bar.

9. Movant is not now a member of the Florida Bar.

10. Movant is not a suspended member of the Florida Bar.

11. Movant is not a disbarred member of The Florida Bar nor has Movant received a disciplinary resignation or disciplinary revocation from The Florida Bar.

12. Movant has not previously been disciplined or held in contempt by reason of misconduct committed while engaged in representation pursuant to Florida Rule of Judicial Administration 2.510.

13. Movant has not filed a motion to appear as counsel in Florida state courts during the past five (5) years.

14. Local counsel of record associated with Movant in this matter

is:

- a. **Name:** Matthew Triggs
- b. **Florida Bar No.:** 0865745
- c. **Law Firm:** Proskauer Rose LLP
- d. **Address:** 2255 Glades Road, Suite 421-A, Boca Raton, FL 33431
- e. **Email:** mtriggs@proskauer.com
- f. **Telephone:** (561) 241-7400
- g. **Fax:** (561) 241-7145

15. Movant has read the applicable provisions of Florida Rule of Judicial Administration 2.510 and Rule 1-3.10 of the Rules Regulating The Florida Bar and certifies that this verified motion complies with those rules.

16. Movant agrees to comply with the provisions of the Florida Rules of Professional Conduct and consents to the jurisdiction of the courts and the Bar of the State of Florida.

WHEREFORE, Movant respectfully requests permission to appear in this court for this cause only.

Dated: September 23, 2021

s/ Joseph S. Hartunian  
Joseph S. Hartunian, Esq.  
PROSKAUER ROSE LLP  
1001 Pennsylvania Ave. N.W.  
Suite 600 South  
Washington, D.C. 20004  
Telephone: (202) 416-6859  
Facsimile: (202) 416-6899  
Primary e-mail:  
jhartunian@proskauer.com

DISTRICT OF COLUMBIA

I, Joseph S. Hartunian, do hereby swear or affirm under penalty of perjury that I am the Movant in the above-styled matter; that I have read the foregoing Motion and know the contents thereof, and the contents are true of my own knowledge and belief.

s/ Joseph S. Hartunian  
Movant

I hereby consent to be associated as local counsel of record in this cause pursuant to Florida Rule of Judicial Administration 2.510.

Dated: September 23, 2021

s/ Matthew Triggs  
Matthew Triggs  
Florida Bar No. 0865745  
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*Counsel for Appellants Dan Daley,  
Frank C. Ortis, Rebecca A. Tooley,  
Justin Flippen, City of Coral Springs,  
City of Pembroke Pines, City of Coconut  
Creek and City of Wilton Manors*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 23, 2021, a true and correct copy of the foregoing motion will be served upon all counsel of record through the Florida Courts E-Filing Portal and the \$250.00 pro hac vice filing fee will be submitted electronically through the Florida Bar Member Portal, accompanied by an uploaded copy of the foregoing motion.

*s/ Matthew Triggs*  
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Matthew Triggs