# UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA

### TAMPA DIVISION

CASE NUMBER 8: 19-cr-00334-T-35CPT

UNITED STATES OF AMERICA,

Plaintiff,

VS.

JOSEPH S. ANILE, II.

Defendant.

### UNOPPOSED MOTION FOR GERARD MARRONE, ESQ. TO APPEAR PRO HAC VICE

COMES NOW the Defendant, JOSEPH S. ANILE, II, and respectfully moves this Honorable Court, pursuant to Rule 2.02 of the Local Rules of the United States District Court for the Middle District of Florida, that this Court permit Gerard M. Marrone, Esquire, of the Law Office of Gerard M. Marrone, P.C., with a principal office located at 6685 73rd Place, Middle Village, New York 11379 to appear and practice in this Court in the above-entitled action as counsel for JOSEPH S. ANILE, II, and submits the following Memorandum of Law in support of this Motion.

- Gerard M. Marrone is a member in good standing of the bars of the following Court(s):
  - a. The Supreme Court of New York (admitted 2001)
  - b. All Federal District Courts in New York
- 2. Gerard M. Marrone is a member of the Bar in good standing in every jurisdiction where he has been admitted, and there are no disciplinary proceedings pending against him as a member of the Bar in any jurisdiction. The appearance and active participation of Gerard M. Marrone is necessary for the thorough and effective presentation of Mr. Anile's defense in this matter.

- 3. Pursuant to Local Rule 2.02, Gerard M. Marrone designates Michael Gonzalez, Esq., a member of the Bar of this Court, who maintain an office in the State of Florida at 5001 West Cypress Street, Tampa, Florida 33607 for the practice of law with whom the Court and opposing counsel may readily communicate regarding the conduct of the case and upon whom papers may be served.
  - 4. Gerard M. Marrone's Certificate in support of this Motion is attached hereto as Exhibit "A".
- 5. After communication with the Asst. U.S. Attorney, Rachelle Des Vaux Bedke, undersigned counsel represents to the Court that Plaintiff has no objection to the granting of this Motion.

## MEMORANDUM OF LAW

Rule 2.02 of the Local Rules of the United States District Court for the Middle District of Florida provides for the Special Admission of non-resident attorneys to practice before this Court. The Motion for Special Admission to practice by Gerard M. Marrone complies with the requirements of Local Rule 2.02.

WHEREFORE, Defendant, JOSEPH S. ANILE, II. respectfully request that the Court grant this Motion to Appear *Pro Hac Vice* on behalf of Gerard M. Marrone.

/s/ Michael Gonzalez

Michael Gonzalez, Esq. Gonzalez Law Group Florida Bar Number: 0066826 5001 W. Cypress St. Tampa, FL 33607 Telephone: (813) 282-7800

Fax: (813) 282-7806

E-Mail: michael@michaelgonzalezlaw.com

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on September 24, 2019, I electronically filed the filed foregoing with the Clerk of Court by using CM/ECF system which will send a notice to all counsel of record:

Rachelle Des Vaux Bedke, Esq.

Henry Gonzalez, Esq.

Gerard M. Marrone, Esq.

/s/ Michael Gonzalez

Michael Gonzalez, Esq. Gonzalez Law Group

Florida Bar Number: 0066826

5001 W. Cypress St. Tampa, FL 33607

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E-Mail: michael@michaelgonzalezlaw.com

## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA

## CERTIFICATE IN SUPPORT OF AN APPLICATION FOR GENERAL ADMISSION TO PRACTICE

Pursuant to Local Rule 2.01(b), I certify that I am a member in good standing of The Florida Bar, and the Bar of this Court, and that:

I am personally acquainted with	h applicant Gerard M. Marrone.
	moral character and is otherwise competent and eligible for genera
09/24/19	
Date	Sponsor's Signature
Sponsor's Name:	Michael Gonzalez, Ęsq.
Sponsor's Address:	5001 West Cypress St.
	Tampa, FL 33607
Sponsor's Telephone Number:	(813) 282-7800
Sponsor's E-mail Address:	michael @ michaelgonzalezlaw.com
Sponsor's Florida Bar ID Number:	0066826

**EXHIBIT** 

Revised: 8/9/07

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