

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DANIEL WILLIAMS,
and EDWARD WILLIAMS,

Plaintiffs,

-vs-

**NOTICE OF MOTION FOR
ADMISSION PRO HAC VICE**
Docket No. 05-CV-0836 S(F)
(NYS Supreme Court, Erie Cty
Index No. I2005-007056)

BEEMILLER, INC. d/b/a HI-POINT,
CHARLES BROWN,
MKS SUPPLY, INC.,
INTERNATIONAL GUN-A-RAMA,
KIMBERLY UPSHAW,
JAMES NIGEL BOSTIC,
CORNELL CALDWELL, and
JOHN DOE TRAFFICKERS 1-10,

Defendants.

MOTION BY:

Plaintiffs, DANIEL WILLIAMS and EDWARD WILLIAMS, by their attorneys CONNORS & VILARDO, LLP.

**DATE, TIME & PLACE
OF HEARING:**

At a date and time to be determined by the Court, before Hon. William M. Skretny, 68 Court Street, Buffalo, New York.

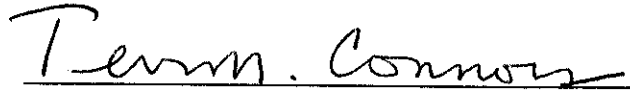
SUPPORTING PAPERS:

Affidavit of Terrence M. Connors, Esq., with exhibits.

RELIEF REQUESTED:

An order of this Court, pursuant to Local Rule 83.1(i), permitting Elizabeth S. Haile and Jonathan E. Lowy, Esqs., both of the Legal Action Project of the Brady Center to Prevent Gun Violence, to appear pro hac vice as counsel for plaintiffs DANIEL WILLIAMS and EDWARD WILLIAMS; and any other relief that the Court may deem proper.

DATED: Buffalo, New York
January 23, 2006



Terrence M. Connors
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EDWARD WILLIAMS
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TO: John F. Renzulli, Esq.
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Lewisburg, Pennsylvania 17837

Cornell Caldwell
Greene Correctional Facility
P.O. Box 8
Coxsackie, New York 12051-0008

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DANIEL WILLIAMS,
and EDWARD WILLIAMS,

Plaintiffs,

-vs-

AFFIDAVIT OF SERVICE
No. 05-CV-0836S(F)
(NYS Supreme Court, Erie Cty
Index No. I2005-007056)

BEEMILLER, INC. d/b/a HI-POINT,
CHARLES BROWN,
MKS SUPPLY, INC.,
INTERNATIONAL GUN-A-RAMA,
KIMBERLY UPSHAW,
JAMES NIGEL BOSTIC,
CORNELL CALDWELL, and
JOHN DOE TRAFFICKERS 1-10,

Defendants.


STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

TERRENCE M. CONNORS, ESQ., being duly sworn, deposes
and says that on January 23, 2006:

1. He electronically filed the forgoing Notice of
Motion; and Supporting Affidavit of Terrence M. Connors, Esq.,
with exhibits, with the Clerk of the District Court using its
CM/ECF system, which would then electronically notify the
following CM/ECF participants on this case: Renzulli, Piscioti
& Renzulli, LLP, Scott Charles Allan, Esq., of Counsel, attorneys
for Beemiller, Inc. d/b/a Hi-Point; Damon & Morey LLP, Thomas J.
Drury, Esq., of Counsel, attorneys for Charles Brown and MKS
Supply, Inc.; Piscioti & Malsch, PC, Jeffrey Martin Malsch,
Esq., of Counsel, attorneys for MKS Supply, Inc.; and Lustig &

Brown, LLP, James J. Dugan, Esq., of Counsel, attorneys for International Gun-A-Rama; and

2. A copy of the Notice of Motion; and Supporting Affidavit of Terrence M. Connors, Esq., with exhibits, were served by first-class mail to John F. Renzulli, Esq.; John P. Ford, Esq.; Scott L. Braum, Esq.; Timothy R. Rudd, Esq.; Kimberly Upshaw; James Nigel Bostic; and Cornell Caldwell, each at the respective addresses shown in the attached Notice of Motion.


TERRENCE M. CONNORS

Sworn to before me this
23rd day of January, 2006.


Notary Public

SHARON BALDWIN
Notary Public, State of New York
Qualified in Erie County
My Commission Expires Nov. 30, 2006

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DANIEL WILLIAMS,
and EDWARD WILLIAMS,

Plaintiffs,

-vs-

AFFIDAVIT IN SUPPORT OF
MOTION FOR ADMISSION PRO
HAC VICE

BEMILLER, INC. d/b/a HI-POINT,
CHARLES BROWN,
MKS SUPPLY, INC.,
INTERNATIONAL GUN-A-RAMA,
KIMBERLY UPSHAW,
JAMES NIGEL BOSTIC,
CORNELL CALDWELL, and
JOHN DOE TRAFFICKERS 1-10,

Docket No. 05-CV-0836 S(F)

Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

TERRENCE M. CONNORS, ESQ., being duly sworn, deposes
and says as follows:

1. I am an attorney at law duly licensed to practice
my profession in the State of New York and a partner with the law
firm of CONNORS & VILARDO, LLP, local counsel for Plaintiffs
DANIEL WILLIAMS and EDWARD WILLIAMS in the above-captioned
action; as such, I am fully familiar with the facts and
circumstances of this action.

2. I submit this affidavit in support of Plaintiffs'
Motion to admit Elizabeth S. Haile, Esq., and Jonathan Elias
Lowy, Esq., pro hac vice. Plaintiffs make this request to allow

Ms. Haile and Mr. Lowy to appear in this action as co-counsel for them.

3. As set forth in the supporting affidavit of Elizabeth S. Haile, attached as Exhibit A, Ms. Haile is a staff attorney for the Legal Action Project of the Brady Center to Prevent Gun Violence. Ms. Haile is admitted to practice in Illinois and the District of Columbia; in the United States District Courts for the Northern District of Illinois and the District of Columbia; and in the United States Supreme Court.

4. As set forth in the supporting affidavit of Jonathan Elias Lowy, attached as Exhibit B, Mr. Lowy is a senior attorney for the Legal Action Project of the Brady Center to Prevent Gun Violence. Mr. Lowy is admitted to practice in Virginia and in the District of Columbia.

5. Upon information and belief, Ms. Haile and Mr. Lowy are and always have been members in good standing in their respective jurisdictions, and have no disciplinary proceedings pending against them.

WHEREFORE, Plaintiffs respectfully request that this Court issue an Order admitting Ms. Haile and Mr. Lowy on a pro hac vice basis, and providing any other relief that the Court may deem proper.


Terrence M. Connors

Sworn to before me on this
23rd day of January, 2006.


Notary Public

JAMES W. GRABLE, JR.
Notary Public, State of New York
Qualified in Erie County
My Commission Expires, March 10, 2007

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DANIEL WILLIAMS,
and EDWARD WILLIAMS,

Plaintiffs,

SUPPORTING AFFIDAVIT

-vs-

Docket No. 05-CV-0836 S(F)

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JAMES NIGEL BOSTIC,
CORNELL CALDWELL, and
JOHN DOE TRAFFICKERS 1-10,

Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

ELIZABETH S. HAILE, being duly sworn, deposes and
states as follows:

1. I offer this affidavit in support of Plaintiffs' Motion to permit me to appear as co-counsel in the above-captioned action, on a pro hac vice basis. For purposes of this litigation, I have an association with Terrence M. Connors, Esq., of Connors & Vilardo, LLP, 1020 Liberty Building, 420 Main Street, Buffalo, New York 14202, local counsel for Plaintiffs.

2. I reside in Washington, DC.

3. I am a staff attorney for the Legal Action Project of the Brady Center to Prevent Gun Violence, whose offices are located at 1225 Eye Street, NW, Suite 1100, Washington, D.C., 20005. The Legal Action Project specializes in firearms

litigation.

4. I received my J.D. Degree in 1999 from Georgetown University Law Center. My major areas of professional activities since my initial bar admission consist of representation of plaintiffs and defendants in the areas of employment law and tort law, as well as my work at the Legal Action Project.

5. I have been admitted to practice law in Illinois since 1999, and in the District of Columbia since 2000. I also am admitted to the United States District Courts for the North District of Illinois and the District of Columbia, as well as to the United States Supreme Court.

6. I am a member in good standing of all bars or court jurisdictions to which I belong. I have never been held in contempt of court; censured in a disciplinary proceeding; suspended or disbarred by any court; or admonished by any disciplinary committee of an organized bar. I am not the subject of any pending complaint before any court.

7. I have read and am familiar with each of the following: 28 U.S.C. §§ 1330-1452; the Federal Rules of Civil Procedure; the Federal Rules of Criminal Procedure; the Federal Rules of Evidence; the Local Rules of Practice for the United States District Court for the Western District of New York; the Revised Plan for the Prompt Disposition of Criminal Cases for the Western District of New York; the New York State Lawyers Code of

United States District Court for the Western District of New York.

8. I agree to adhere faithfully to the New York State Lawyers Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York.



Elizabeth S. Haile

Sworn to before me this
18th day of January, 2006.



Notary Public

Kathleen L. Brewster, Notary Public, D.C.
My commission expires October 14, 2008

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

APPENDIX TO CIVILITY PRINCIPLES

OATH OF OFFICE

I do solemnly swear (or affirm):

I will support the Constitution of the United States and the Constitution of the State of New York;

I will maintain the respect due to Courts of Justice and judicial officers;

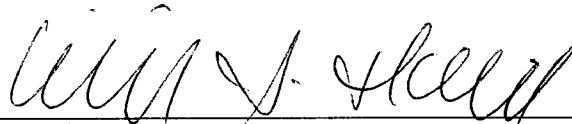
I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense except such as I believe to be honestly debatable under the law of the land;

I will employ for the purpose of maintaining the causes confided to me such means only as are consistent with truth and honor and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidence and preserve inviolate the secrets of my client and will accept no compensation in connection with his business except from him or with his knowledge and approval;

I will abstain from all offensive personality and advance no fact prejudicial to the honor or reputation of a party or witness unless required by the justice of the cause with which I am charged;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed on members of the bar as conditions for the privilege to practice law in this State and before this Court.



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

DANIEL WILLIAMS,
and EDWARD WILLIAMS,

Plaintiffs,

SUPPORTING AFFIDAVIT

-vs-

Docket No. 05-CV-0836 S(F)

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JOHN DOE TRAFFICKERS 1-10,

Defendants.

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

JONATHAN ELIAS LOWY, being duly sworn, deposes and
states as follows:

1. I offer this affidavit in support of Plaintiffs' Motion to permit me to appear as co-counsel in the above-captioned action, on a pro hac vice basis. For purposes of this litigation, I have an association with Terrence M. Connors, Esq., of Connors & Vilaro, LLP, 1020 Liberty Building, 420 Main Street, Buffalo, New York 14202, local counsel for Plaintiffs.

2. I reside in Rockville, Maryland.

3. I am a senior attorney for the Legal Action Project of the Brady Center to Prevent Gun Violence, whose offices are located at 1225 Eye Street, NW, Suite 1100, Washington, D.C., 20005. The Legal Action Project specializes in

firearms litigation.

4. I received my J.D. Degree in 1988 from the University of Virginia School of Law. My major areas of professional activities since my initial bar admission consist of tort law and my work at the Legal Action Project. I have also litigated in other areas, including civil rights.

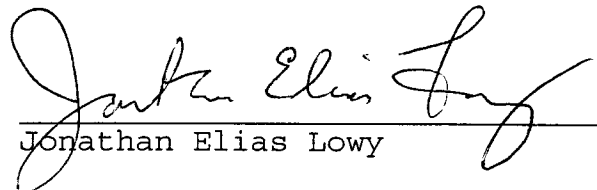
5. I am a member of the Virginia and District of Columbia of bar associations. I have been admitted to practice law in Virginia since October 14, 1988, when I was admitted to the Supreme Court of Virginia, and in the District of Columbia since May 26, 1989, when I was admitted to the District of Columbia Court of Appeals. I have also been admitted pro hac vice to appear in courts throughout the country, including California, Florida, Illinois, Massachusetts, Missouri, Ohio, Pennsylvania, Texas, Washington state, and West Virginia.

6. I am a member in good standing of all bars or court jurisdictions to which I belong. I have never been held in contempt of court; censured in a disciplinary proceeding; suspended or disbarred by any court; or admonished by any disciplinary committee of an organized bar. I am not the subject of any pending complaint before any court.


7. I have read and am familiar with each of the following: 28 U.S.C. §§ 1330-1452; the Federal Rules of Civil Procedure; the Federal Rules of Criminal Procedure; the Federal

Rules of Evidence; the Local Rules of Practice for the United States District Court for the Western District of New York; the Revised Plan for the Prompt Disposition of Criminal Cases for the Western District of New York; the New York State Lawyers Code of Professional Responsibility; and the Civility Principles of the United States District Court for the Western District of New York.

8. I agree to adhere faithfully to the New York State Lawyers Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York.


Jonathan Elias Lowy

Sworn to before me this
18th day of January, 2006.


Notary Public

Kathleen L. Brewster, Notary Public, D.C.
My commission expires October 14, 2008

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

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OATH OF OFFICE

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I will maintain the respect due to Courts of Justice and judicial officers;

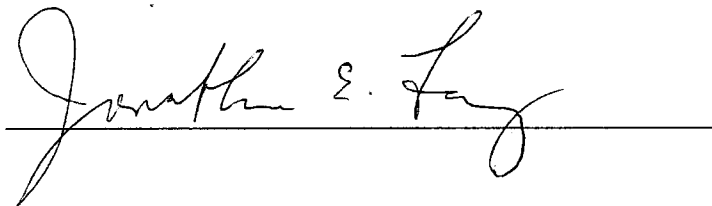
I will not counsel or maintain any suit or proceeding which shall appear to me to be unjust nor any defense except such as I believe to be honestly debatable under the law of the land;

I will employ for the purpose of maintaining the causes confided to me such means only as are consistent with truth and honor and will never seek to mislead the judge or jury by an artifice or false statement of fact or law;

I will maintain the confidence and preserve inviolate the secrets of my client and will accept no compensation in connection with his business except from him or with his knowledge and approval;

I will abstain from all offensive personality and advance no fact prejudicial to the honor or reputation of a party or witness unless required by the justice of the cause with which I am charged;

I will in all other respects conduct myself personally and professionally in conformity with the high standards of conduct imposed on members of the bar as conditions for the privilege to practice law in this State and before this Court.

A handwritten signature in cursive script, reading "Jonathan E. Fay", is written over a horizontal line.