

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No.: 9:25-cv-80880

JANE DOES et. Al

Plaintiff,

v.

UNITED STATES OF AMERICA

Defendant.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rule 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Jennifer C. Plotkin, Esq. seeking Admission of the law firm of Merson Law, PLLC, 950 Third Avenue, 18th floor, New York, New York 10022; (212) 603-9100 for purposes of appearance as co-counsel on behalf of Plaintiffs in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Jennifer C. Plotkin, Esq. to receive electronic filings in this case, and in support thereof states as follows:

1. Jennifer C. Plotkin, Esq. is not admitted to practice in the Southern District of Florida and is a member in good standing of the New York Bar, Southern District.

2. Movant, Todd J. Michaels, Esquire, of the law firm of The Haggard Law Firm, 330 Alhambra Circle, Coral Gables, Florida, 33134; (305) 446-5700, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with

the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Jennifer C. Plotkin, Esq. has made payment of this Court's \$ 250.00 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Jennifer C. Plotkin, Esq. by and through designated counsel and pursuant to Section 2B of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Jennifer C. Plotkin, Esq. at email address: jplotkin@mersonlaw.com

WHEREFORE, Todd J. Michaels, Esq., moves this Court to enter an Order Jennifer C. Plotkin, Esq., to appear before this Court on behalf of Plaintiffs, for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Jennifer C. Plotkin, Esq.

Date: July 14, 2025

Respectfully submitted,

/s/ TODD J. MICHAELS

Todd J. Michaels, Esq.
Florida Bar # 568597
TJM@haggardlawfirm.com
The Haggard Law Firm
330 Alhambra Circle
Coral Gables, FL 33134
(305) 446-5700
Attorneys for Plaintiffs