

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CIVIL NO. 1:11-CR-161-1**

**UNITED STATES OF AMERICA,**

**v.**

**JOHNNY REID EDWARDS,**

**Defendant.**

**MOTION FOR ADMISSION OF ABBE DAVID LOWELL  
TO PRACTICE *PRO HAC VICE***

Pursuant to Rule 83.1 of the Local Rules of the United States District Court for the Middle District of North Carolina, James P. Cooney III hereby moves for the admission of Abbe David Lowell, an attorney with Chadbourne & Parke LLP, to appear *pro hac vice* on behalf of Defendant Johnny Reid Edwards in the above-captioned case.

In support of this motion, James P. Cooney III respectfully shows the Court:

1. The declaration of the out-of-state attorney, Abbe David Lowell, is attached hereto as Exhibit A. The declaration sets forth his qualifications to appear in this case pursuant to Local Rule 83.1.
2. The representation of Defendant by Abbe David Lowell will be in conjunction with that of the undersigned.
3. Chadbourne & Parke LLP is the counsel of choice for the Defendant.

4. Chadbourne & Parke LLP will continue to represent Defendant in this matter until this matter has concluded, or permission has been granted to withdraw by order of this Court.

WHEREFORE, for the reasons set forth herein, James P. Cooney III respectfully requests the Court to allow this Motion for Admission *Pro Hac Vice*.

Respectfully submitted this the 19th day of August, 2011.

**WOMBLE CARLYLE SANDRIDGE & RICE**  
*A Professional Limited Liability Company*

/s/ James P. Cooney III

James P. Cooney III (NCSB #12140)  
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*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 19, 2011, I electronically filed the foregoing **MOTION FOR ADMISSION OF ABBE DAVID LOWELL TO PRACTICE *PRO HAC VICE*** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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/s/ James P. Cooney III

# EXHIBIT A

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**UNITED STATES OF AMERICA,**

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**JOHNNY REID EDWARDS,**

**Defendant.**

**DECLARATION OF ABBE DAVID LOWELL IN SUPPORT OF  
MOTION FOR ADMISSION TO PRACTICE *PRO HAC VICE***

NOW COMES Abbe David Lowell, and declares as follows:

1. I am an attorney duly licensed to practice law in the States of New York and Maryland, in the District of Columbia, and in the U.S. Supreme Court and numerous federal appellate and district courts. I am currently engaged in the practice of law as an attorney with the law firm of Chadbourne & Parke LLP, located at 1200 New Hampshire Avenue NW, Washington, DC, 20036, and at 30 Rockefeller Center, New York, NY, 10112.

2. Unless prohibited from doing so or granted leave to withdraw by order of this Court, I will continue to represent Defendant Johnny Reid Edwards in the above-captioned matter until the final determination thereof, and with reference to all matters incident to this lawsuit.

3. I agree to be subject to the orders and amenable to the disciplinary action and the civil jurisdiction of the United States District Court for the Middle District of North Carolina in all respects as if I were a regularly admitted member of the bar of the United States District Court for the Middle District of North Carolina.

4. I am associated in the defense of the above-captioned matter with James P. Cooney III (NCSB #12140) of the North Carolina law firm of Womble Carlyle Sandridge & Rice, PLLC. Mr. Cooney is duly admitted to practice in the United States District Court for the Middle District of North Carolina.

5. I have never been subject to public discipline nor had any *pro hac vice* admission revoked by any court or attorney regulatory organization.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted this the 19th day of August, 2011

/s/ Abbe David Lowell  
Abbe David Lowell