**Donald E. Godwin** *(pro hac vice pending)*
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FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

JUL 14 2021

TAMMY H. DOWNS, CLERK
By: DEP CLERK

**UNITED STATES DISTRICT COURT**
**EASTERN DISTRICT OF ARKANSAS**

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| FEDERAL TRADE COMMISSION, and<br><br>STATE OF ARKANSAS, *ex rel.* LESLIE RUTLEDGE, ATTORNEY GENERAL<br><br>Plaintiffs,<br><br>vs.<br><br>BINT OPERATIONS LLC, a limited liability company,<br><br>LASHONDA MOORE, individually and as an officer of BINT OPERATIONS LLC, and<br><br>MARLON DEANDRE MOORE, formerly known as MARLON DEANDRE MAIDEN, individually and as an officer of BINT OPERATIONS LLC<br><br>Defendants. | CASE NO.: 4:21-CV-00518-KGB<br><br>**MOTION FOR LEAVE TO APPEAR *PRO HAC VICE*** |

Donald E. Godwin ("Counsel"), files this Motion for Leave to Appear *Pro Hac Vice* under Local Rule 83.5(d) for leave of court to appear *pro hac vice* without local counsel and pursuant to such authority states the following:

1. Counsel is an attorney at the law firm of Godwin Bowman PC, located at 1201

Elm Street, Suite 1700, Dallas, Texas 75270, which is counsel for Defendants BINT Operations LLC, Lashonda Moore, and Marlon Deandre Moore ("Defendants").

2. Counsel is an active member in good standing with the U.S. Supreme Court, State Courts of Texas, U.S. Court of Appeals, Fifth Circuit, U.S. District Court for the Western District of Oklahoma, and the U.S. District Courts for the Northern, Southern, Eastern and Western Districts of Texas.

3. Counsel, along with the attorneys noted-below, Stefanie Major McGregor and Kristin Burns, have actively began seeking admission to the Bar of this Court with accompanied certificates of good standing. Given the status of the pending admissions and the need to timely respond to Plaintiffs' Complaint, however, Counsel is filing this Motion as an abundance of caution.

4. During the pendency of this litigation, Counsel will at all times affirm to the Local Rules of this Court and to the jurisdiction of the Court in matters of discipline.

5. Accordingly, Counsel respectfully requests leave of the Court to waive the requirement that local counsel be retained for Defendants during the pendency of this litigation.

6. By the filing of this Motion, Counsel and Defendants do not intend to waive any defenses or objections to the jurisdiction or venue of this Court.

WHEREFORE, Counsel respectfully requests this Court grant leave and permit Counsel to appear *pro hac vice* without local counsel during the pendency of this litigation.

Respectfully submitted,

**GODWIN | BOWMAN PC**

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

I hereby certify that on or about the 14th day of July, 2021, a true and correct copy of the above and foregoing pleading was electronically filed with the Clerk of the Court for the U.S. District Court, Eastern District of Arkansas, and that I have served the documents on all counsel of record in a manner authorized by the Federal Rules of Civil Procedure.

Donald E. Godwin