

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

ANTHONY R. EDWARDS, *et al.*,

Plaintiffs,

v.

DELOITTE & TOUCHE, LLP,

Defendant.

No. 1:16-cv-21221

**SUPPLEMENTAL SUBMISSION REGARDING PRO HAC VICE
MOTIONS FOR PETER A. WALD AND CHRISTOPHER S. TURNER**

In accordance with Local Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, and this Court's August 26, 2016 Order, the undersigned respectfully supplements the motions for the appearance pro hac vice of Peter A. Wald and Christopher S. Turner as follows.

On August 24, 2016, the undersigned filed motions for attorneys Peter A. Wald and Christopher S. Turner of Latham & Watkins LLP to appear pro hac vice in the above-captioned matter on behalf of Defendant Deloitte & Touche LLP. [D.E. 30 & D.E. 31.]

On August 26, 2016, this Court issued an order advising the parties that the Clerk informed the Court that Mr. Wald and Mr. Turner had appeared in more than three cases in a 365-day period and requesting that Mr. Wald and Mr. Turner supplement their motions with information providing good cause to waive or modify the prohibition in Rule 4(b) of the Special Rules Governing the Admission and Practice of Attorneys against appearance by those attorneys

presumed to engage in “general practice” in the United States District Court for the Southern District of Florida. [D.E. 32.]

Pursuant to this Court’s Order, the undersigned provides the following information, which constitutes good cause for the Court to waive or modify the prohibition in Rule 4(b), as neither Mr. Wald nor Mr. Turner is engaged in “general practice” in the United States District Court for the Southern District of Florida.

We believe that the three prior cases the Clerk has identified are the actions captioned (1) *Federal Home Loan Mortgage Corp. v. Deloitte & Touche, LLP*, No. 1:14-cv-23713-UU (S.D. Fla.) (the “Freddie Mac Action”); (2) *Federal Home Loan Mortgage Corp. v. Deloitte & Touche, LLP v. Federal Housing Finance Agency*, No. 1:15-MC-22175-UU (S.D. Fla.); and (3) *Federal Home Loan Mortgage Corp. v. Deloitte & Touche LLP v. Office of Inspector General, Federal Housing Finance Agency*, No. 1:15-MC-22754-UU (S.D. Fla.). These are the only three actions in the United States District Court for the Southern District of Florida in which Mr. Wald and Mr. Turner have appeared in the last 365 days.

Although these three actions had different captions, they concerned a single case and a single representation, and thus were consolidated in the same Court. The Freddie Mac Action was a negligence action before the Hon. Ursula Ungaro. Each of the other two miscellaneous actions was brought against a federal agency to enforce a subpoena issued in the Freddie Mac Action. Each of those two subpoena-related actions was originally filed in the United States District Court for the District of Columbia and then transferred to the Southern District of Florida to be handled by the District Judge and Magistrate Judge presiding over the Freddie Mac Action. And each of those two miscellaneous actions was summarily closed following resolution of the discovery issues raised therein.

In sum, though Mr. Wald and Mr. Turner have appeared in three separately-captioned actions in this District in the past 365 days, these three actions functionally constituted a single case. Under these circumstances, we submit that Mr. Wald and Mr. Turner were engaged in a single representation and, as such, were not engaged in “general practice” in this District. Accordingly, we request that this Court waive or modify the prohibition in Rule 4(b) to permit Mr. Wald and Mr. Turner to appear pro hac vice in this matter.

WHEREFORE, the undersigned supplements the prior motions to this Court to enter an Order for Peter A. Wald and Christopher S. Turner to appear before this Court on behalf of Defendant Deloitte & Touche, LLP for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Peter A. Wald and Christopher S. Turner.

Date: August 31, 2016

Respectfully submitted,

/s/ Matthew P. Weinshall

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 31, 2016, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court, by using the CM/ECF system, causing a true and correct copy to be served on all counsel of record.

/s/ Matthew P. Weinshall
Matthew P. Weinshall