

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

US AIRLINE PILOTS ASSOCIATION,)	
)	
Plaintiff,)	14-CIV-00328 (BAH)
)	
v.)	
)	
US AIRWAYS, INC., AMERICAN AIRLINES, INC.,)	
and ALLIED PILOTS ASSOCIATION,)	
)	
Defendants.)	

MOTION FOR ADMISSION OF JOY MELE *PRO HAC VICE*

Pursuant to Local Civil Rule 83.2(d), Movant Brian O’Dwyer, an attorney admitted to the Bar of this Court and in good standing, respectfully moves for the admission of Joy Mele *pro hac vice* as co-counsel for plaintiff US Airline Pilots Association. As grounds, therefore, Movant states:

1. Movant is a member in good standing of the Bar of this Court and licensed to practice in the District of Columbia (D.C. Bar Number 993471).
2. Ms. Mele is a member in good standing of the Bars of the State of New York and the State of New Jersey.
3. Ms. Mele is not currently and has never previously been the subject of any disciplinary action by any bar.
4. The Declaration of Joy Mele in support of Motion for Admission *Pro Hac Vice* is being filed herewith in compliance with Local Civil Rule 83.2(d).
5. Pursuant to Local Civil Rule 7(m), counsel for plaintiff has conferred with counsel for defendants regarding the filing of this motion. The defendants have consented to this filing; therefore, this motion is unopposed.

WHEREFORE, Movant respectfully requests admission of Joy Mele *pro hac vice* as counsel for plaintiff US Airline Pilots Association.

Dated: March 24, 2014

Respectfully submitted,

/s/ Brian O'Dwyer
Brian O'Dwyer (D.C. Bar No. 993471)
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Counsel for plaintiff
US Airline Pilots Association

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US AIRLINE PILOTS ASSOCIATION,)	
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Plaintiff,)	
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v.)	
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US AIRWAYS, INC., AMERICAN AIRLINES, INC.,)	
and ALLIED PILOTS ASSOCIATION,)	
)	
Defendants.)	
)	

**DECLARATION OF JOY K. MELE IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, JOY K. MELE, hereby declare:

1. My full name is Joy Kim Mele, I am counsel for plaintiff US Airline Pilots Association. I am an associate with the law firm O’Dwyer & Bernstien, LLP.
2. My office address is 52 Duane Street, New York, NY 10007. My office telephone number is (212) 571-7100.
3. I am a member in good standing of the Bars of the State of New York and the State of New Jersey.
4. I am admitted to practice in the United States District Court for the Southern and Eastern Districts of New York, the United States District Court for the District of New Jersey, the United States Court of Appeals for the Ninth Circuit, the United States Court of Appeals for the Second Circuit, and the United States Supreme Court.
5. I certify that there are no pending disciplinary proceedings against me before any bar, and that I have not been disciplined by any bar in the past.
6. I have not been admitted pro hac vice in this Court within the last two years.

7. I do not engage in the practice of law from an office located in the District of Columbia.

8. I am not currently a member of the District of Columbia Bar, and I do not have an application for membership pending.

9. I certify that I am familiar with the Local Rules of this Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED this 24th day of March 2014.


JOY K. MELE

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2014, a copy of the foregoing was electronically filed via the Court's ECF System. Notice of this filing will be sent to all parties of record via the Court's electronic filing system and by first class mail and e-mail to the following non-ECF participants:

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Pro Hac Vice Counsel for Defendants/Counterclaimants
US Airways, Inc. and American Airlines, Inc.

Dated: March 25, 2014
New York, NY

/s/ Brian O'Dwyer
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