

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

LBRY, INC.,

Defendant.

Civil Action No. 1:21-cv-00260-PB

**MOTION TO ADMIT JOHN E. DEATON *PRO HAC VICE***

Amicus Curiae, Naomi Brockwell (“Brockwell”), respectfully moves this Court to admit John E. Deaton, *pro hac vice*, pursuant to Local Rule 83.2(b). In support of this motion, Brockwell states:

1. The attached supporting affidavit, pursuant to Local Rule 83.2(b)(1), attests that Attorney Deaton is a member in good standing of the bars of the states of Connecticut, Iowa, Rhode Island, the Commonwealth of Massachusetts, and the United State District Court of the District of Rhode Island and the United States Court of Appeals for the First Circuit. Attorney Deaton is not currently suspended or disbarred in any jurisdiction, and there are no previous or pending disciplinary proceedings against me in any state or federal court. He has no prior felony or misdemeanor criminal convictions. Lastly, he has never been denied an application *pro hac vice*, nor has any court ever revoked such status.

2. Pursuant to Local Rule 83.2(b)(2), the fee for admission is being paid simultaneously with the filing of this motion.

3. This motion is supported entirely by the accompanying affidavit and the points made above, and therefore does not require a memorandum pursuant to Local Rule 7.1(a)(2).

WHEREFORE, Brockwell respectfully requests that the Court admit John E. Deaton *pro hac vice*.

Dated: December 20, 2022

Respectfully submitted,  
NAOMI BROCKWELL  
By her Attorney,  
/s/ William S. Gannon  
William S. Gannon, NH Bar 892  
740 Chestnut Street  
Manchester, New Hampshire 03104  
**bgannon@gannonlawfirm.com**  
**Phone: 603-621-0833**  
**Fax: 603-621-0830**

#### **CERTIFICATE OF SERVICE**

I hereby certify that, on December 20, 2022, I caused true and correct copies of the foregoing to be served on counsel of record for all parties that have appeared to date through the Court's CM/ECF system.

/s/ William S. Gannon

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

LBRY, INC.,

Defendant.

Civil Action No. 1:21-cv-00260-PB

**AFFIDAVIT OF JOHN E. DEATON IN SUPPORT OF MOTION TO ADMIT *PRO HAC*  
*VICE***

I, John E. Deaton, do hereby depose and state as follows:

1. My office address, email address, and telephone number are as follows:

Deaton Law Firm LLC  
450 North Broadway  
East Providence, RI 02914  
Email: all-deaton@deatonlawfirm.com  
Tel.: +1 (401) 351-6400

2. I am admitted to practice in the following courts:
  - a. State Court of Connecticut (2005)
  - b. State of Iowa (1995)
  - c. State of Rhode Island (2001)
  - d. Commonwealth of Massachusetts (2004)
  - e. U.S. District Court for the District of Rhode Island (2005)
  - f. U.S. Court of Appeals for the First Circuit (2021)
3. I am in good standing and eligible to practice in the above-listed courts.
4. I am not currently suspended or disbarred in any jurisdiction.

5. I have never been denied admission to practice before any court. There are no previously imposed or pending disciplinary matters in which I am involved. I do not have any prior felony or misdemeanor criminal convictions.
6. I do not have any prior denials or revocations of *pro hac vice* status in any court.

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

Dated: December 20, 2022

Respectfully Submitted

/s/ John E. Deaton

John E. Deaton, Esq.

Deaton Law Firm LLC

450 North Broadway

East Providence, RI 02914

Tel.: (401) 351-6400

Fax: (401) 351-6401

all-deaton@deatonlawfirm.com