

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION**

**Plaintiff,**

**v.**

**TELEXFREE, INC., TELEXFREE, LLC,  
JAMES M. MERRILL, CARLOS N.  
WANZELER, STEVEN M. LABRIOLA,  
JOHSEPH H. CRAFT, SANDERLEY  
RODRIGUES DE VASCONCELOS,  
SANTIAGO DE LA ROSA, RANDY N.  
CROSBY, and FAITH R. SLOAN**

**Defendants,**

**And**

**TELECFREE FINANCIAL, INC.,  
TELEXELECTRIC, LLP and  
TELEXMOBILE HOLDINGS, INC.**

**Relief Defendants**

**Case No. 1:14-cv-11858**

**DEFENDANTS MOTION FOR PRO HAC VICE LIMITED ADMITTANCE**

**PLEASE TAKE NOTICE** that in accordance with Local Rule 83.5.3 of the Practice by Persons not Members of the Bar of the United States District Court for the District of Massachusetts, the undersigned respectfully moves for the limited admission *pro hac vice* of Robert Eckard of the Law Office of Robert Eckard & Associates, P.A. (“Robert Eckard, Esq.”), 3110 US Alt 19, Palm Harbor, FL 34683, Phone: (727) 772-1941, for the purposes of appearance as counsel for Defendant Sanderley Rodrigues De Vasconcelos and in support thereof states as follows:

*SEC v. Rodrigues*  
Case No.: 1:14-cv-11858  
Our Matter No.: 7499-1501  
Motion to Appear Pro Hac Vice  
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1. Robert Eckard, Esq. is not admitted to practice in the District of Massachusetts (except as to a *pro hac vice* admission in *USA v Sanderley Rodrigues de Vasconcelos*, Case Number 1:15-cr-10227-RWZ) and is a member in good standing of courts including the Florida State Bar, the District of Columbia Bar, the United States District Court for the Southern District of Florida, the United States District Court for Middle District of Florida, the United States District Court for Northern District of Florida, the Court of Appeals for the District of Columbia, the 11th Circuit, the United States Court of International Trade, the United States Supreme Court, and the United States Tax Court.
2. Robert D. Eckard has been a member of the Florida Bar since 1999 and is in good standing. *See attached Exhibit 1.*
3. Movant, Andrea McGeehan of McGeehan Law, LLC 225 Franklin Street, 26<sup>th</sup> Floor, Boston, MA 02110, Phone: (617) 227-7737, is a member in good standing of the Massachusetts State Bar, the United States District Court for Massachusetts.
4. Movant maintains an office in the State of Massachusetts and is authorized to file through the Court's electronic filing system.
5. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures.

6. In accordance with the local rule of this Court, Robert Eckard, Esq. has made payment for this Court's admission fee with the filing of this motion.
7. Robert Eckard, by and through designation counsel hereby requests the Court to provide Notice of Electronic Filings to Robert Eckard, Esq. at e-mail addresses:  
  
[Robert@RobertEckardLaw.com](mailto:Robert@RobertEckardLaw.com);  
[Joelle@RobertEckardLaw.com](mailto:Joelle@RobertEckardLaw.com);  
[Meagan@RobertEckardLaw.com](mailto:Meagan@RobertEckardLaw.com);
8. Robert Eckard has been also admitted (Dkt. 34) pro hac vice in a parallel criminal case in this district (*USA v. Sanderley Rodrigues de Vasconcelos*, Case Number 1:15-cr-10227-RWZ) with the same Defendant.
9. Robert Eckard seeks permission to file a limited Notice of Appearance in this instant matter for purposes of representing the Defendant for responding to the Plaintiff's Motion for Contempt (Dkt. 313-314) and for representation as to any motions for a "carve out" as to the Preliminary Injunction entered in this case (Dkt. 89).
10. This instant case is presently STAYED.

**CERTIFICATE OF GOOD FAITH PURSUANT TO  
LOCAL RULE 7.1(a)(2)**

11. Robert Eckard discussed this *Motion for Limited Pro Hac Vice Admission* with Securities and Exchange Commission (S.E.C.) Attorney Deena Bernstein on September 17, 2015 and the advised that the S.E.C. takes no position on this motion.

**WHEREFORE**, Andrea McGeehan moves this Honorable Court to enter an Order for Robert Eckard of the Law Office of Robert Eckard & Associates, P.A. to appear before this Court

on behalf of Defendant Sanderley Rodrigues De Vasconcelos for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Robert Eckard, Esq.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on September 18, 2015 I electronically filed the foregoing with the Clerk of Court by using CM/ECF system. I also certify that the foregoing document is being served this day on all counsel of record on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized or do not receive electronically Notices of Electronic by U.S. Mail and Email at the addresses listed below.

**McGEEHAN LAW, LLC**

*s/ Andrea McGeehan*

**Andrea McGeehan, Esq.**

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**SERVICE LIST**

*SEC v. Rodrigues*

Case Number: 1:14-cv-11858

United States District Court, District of Massachusetts  
Boston Division

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