

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

YULY MANUEL FERNANDEZ MARTE)	
vs)	
KRISTI NOEM, Secretary, U.S. Department)	
of Homeland Security;)	
RODNEY S. SCOTT, Commissioner,)	2:25-cv-15103
U.S. Customs and Border Protection;)	
RANDI BORGEN, Field Office Director,)	
Newark Field Office, Immigration and)	
Customs Enforcement; and)	
WARDEN, Delaney Hall Detention Facility,)	

MOTION FOR ADMISSION PRO HAC VICE

AND NOW, this 29th day of August 2025, come Jose C. Campos, Esquire and Luis A. Ortiz, Esquire, of counsel to the firm Kunnel, Ortiz & Kunnel (hereinafter, "Applicant"), and move this Honorable Court for his admission Pro Hac Vice, and respectfully represents as follows:

1. Applicant is an attorney and of counsel to the law firm Kunnel, Ortiz & Kunnel, Luis A. Ortiz, Esquire, 121 South Broad Street, 18th Floor, Philadelphia, PA 19107; cell phone: 215-858-3787 Fax: 267-440-6135.
2. Since January 29, 1993, Applicant has been and presently is a member of and in good standing with the Bar of the State of Pennsylvania. Applicant's bar license number is 67705. Attached hereto and marked as Exhibit "A" is Applicant's Certificate of Good Standing.
3. Applicant has been admitted to practice before the following courts:

PA Supreme Court	The Eastern District of PA
_____	_____
The District of Delaware	

_____	_____

4. Applicant is presently a member in good standing of the bars of the courts listed above, except as provided below (list any court named in the preceding paragraph before which Applicant is no longer admitted to practice):

5. I have have not previously applied to Appear Pro Hac Vice in this district

court in Case[s]:

Number: _____ on the ____ day of _____, _____.

Number: _____ on the ____ day of _____, _____.

Number: _____ on the _____ day of _____, _____.

6. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court, except as provided: N/A.

7. Applicant has not been charged, arrested, or convicted of a criminal offense or offenses, except as provided below (omit minor traffic offenses): N/A

8. Applicant has read and is familiar with the Local Rules of the District of New Jersey and will comply with the standards of practice set out therein.

9. Applicant will file an Application for Admission to Practice before the United States District Court for the District of New Jersey, if so requested; or Applicant has co-counsel in this case who is admitted to practice before the United States District Court for the District of New Jersey.

Co-counsel: _____

Mailing address: _____

City, State, Zip Code: _____

Telephone: _____

10. Should the Court grant applicant's motion, Applicant shall tender the amount of \$250.00 pro hac vice fee in compliance with Local Civil Rule 101.1(c)(3) [checks made payable to: Clerk, USDC].

11. Should the Court grant applicant's motion, Applicant shall tender the amount of \$267.00 to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

WHEREFORE, Jose C. Campos, Esq. and the Applicant, Luis A. Ortiz, Esq., pray that this Honorable Court enter an order admitting him Pro Hac Vice in the USDC for the District of New Jersey.

Dated: August 29, 2025



Jose C. Campos, Esquire
Pennsylvania Bar No. 207646
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Respectfully submitted,



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Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Luis A. Ortiz, Esq.

DATE OF ADMISSION

January 29, 1993

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: April 17, 2025

Darian Holland

Darian Holland
Chief Clerk