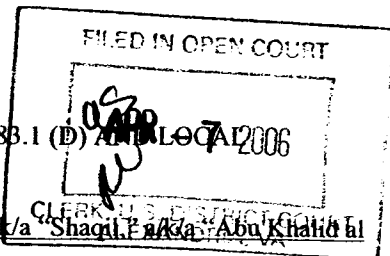


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY FOR A FOREIGN ATTORNEY UNDER LOCAL CIVIL RULE 8B.1 (D) AND LOCAL CRIMINAL RULE 57.4



In Case Number 1:01cr455 (LMB), Case Name United States of America v. Zacarias Moussaoui a/k/a "Shadi, Faka Abu Khalid al Sahrawi," Defendant

Party Represented by Applicant: Plaintiffs In Re September 11 Litigation, Case No. 21 MC 97 (AKH) and Plaintiffs in Case No. 03-CV-9849 (RCC) before the United States District Court for the Southern District of New York

To: The Honorable Judges of the United States District Court for the Eastern District of Virginia

PERSONAL STATEMENT

FULL NAME (no initials, please) Justin Braun Kaplan
Bar Identification Number 022145, State of Tennessee
Firm Name Motley Rice LLC
Firm Phone # (843) 216-9000 Direct Dial # (843) 216-9109 FAX # (843) 216-9450
E-mail Address JKaplan@motleyrice.com
Office Mailing Address 28 Bridgeside Blvd. Mount Pleasant, SC 29465

Name(s) of federal court(s) in which I have been admitted U.S. District Court for the Western District of Tennessee

I certify that the rules of the federal court(s) in which I have been admitted and have my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within ninety (90) days before the submission of the application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Criminal Procedure, and the Federal Rules of Evidence is current.

I am am not a full-time employee of the United States of America, and if so, request exemption from the admission fee.

/s/
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ 4/7/06
(Date)
DAVID BARGER
(Typed or Printed Name)

Court Use Only:

Clerk's Fee Paid ML or Exemption Granted _____

The motion for admission is GRANTED or DENIED _____

/s/
LEONIE M. BRINKEMA
UNITED STATES DISTRICT JUDGE

4/7/06
(Date)