

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JANE DOE,

Plaintiff,

-against-

CORNELL UNIVERSITY, INC., et al.

Defendants.

Index No. 161704/2026

Motion Seq. 003

MOTION FOR ADMISSION
PRO HAC VICE OF W.
WHITNEY SEALS,
ESQUIRE PURSUANT TO
22 NYCRR 520.11

Plaintiff JANE DOE, by her counsel, the attorneys at Rheingold Giuffra Ruffo Plotkin & Hellman, LLP, files this herein Motion, pursuant to 22 NYCRR 520.11, seeking the admission *pro hac vice* of W. Whitney Seals, Esquire. Plaintiff JANE DOE has included a Proposed Order attached hereto as **Exhibit A** for the Court's convenience.

In support of this Motion, Plaintiff JANE DOE states as follows:

1. This motion is made by Plaintiff JANE DOE, by and through counsel Thomas P. Giuffra, Esq., a partner of the law firm of Rheingold Giuffra Ruffo Plotkin & Hellman, LLP, a member in good standing of the bar of the State of New York.
2. The Affidavit of Thomas P. Giuffra, Esq., in support of Attorney Seals's admission is attached hereto as **Exhibit B**.
3. The Affidavit of W. Whitney Seals, Esq., in support of this motion is attached hereto as **Exhibit C**.
4. Certificate of Good Standing issued by the Supreme Court of Alabama in support of this Motion is attached hereto as **Exhibit D**.
5. Plaintiff JANE DOE respectfully asserts that there is good cause for the admission of W. Whitney Seals, Esq., *pro hac vice*, given that Attorney Seals has significant experience

handling civil litigation matters in the State of Alabama.

6. Applicant Attorney Seals is not admitted to the bar of the State of New York but is admitted to the bar of and authorized to practice law in the State of Alabama. He has been admitted to practice law in the State of Alabama since 2004. There are no disciplinary proceedings pending against Applicant Attorney Seals in the State of Alabama or in any other jurisdiction, nor have there been any such proceedings brought against him in any jurisdiction.

7. Applicant Attorney Seals is familiar with and agrees to be bound by the standards of professional conduct imposed upon members of the New York Bar. He also acknowledges and agrees that he shall be subject to the jurisdiction of the courts of the State of New York with respect to any acts occurring over the course of his participation in this case.

8. Plaintiff JANE DOE respectfully requests this motion be granted so that Attorney Seals may attend and fully participate in all matters on her behalf and otherwise engage in pre-trial, trial, and post-trial proceedings in connection with this action.

WHEREFORE, Plaintiff JANE DOE, by and through her counsel and sponsor of Attorney Seals, Thomas P. Giuffra, Esq., respectfully requests that this application for admission *pro hac vice* of W. Whitney Seals, Esq., be granted and that the Court enter an order substantially similar to the proposed order attached hereto as **Exhibit A**.

Dated: New York, NY
October 19, 2026

**RHEINGOLD GIUFFRA RUFFO
PLOTKIN & HELLMAN LLP**
Attorneys for Plaintiff



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-AND-

COCHRUN & SEALS, LLC
Attorneys for Plaintiff
(Pro Hac Vice pending)

/s/ W. Whitney Seals

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