

EN EL TRIBUNAL SUPREMO DE PUERTO RICO  
TRIBUNAL GENERAL DE JUSTICIA  
ESTADO LIBRE ASOCIADO DE PUERTO RICO

Ex Parte:

Charles A. Patrizia  
Timothy L. Dickinson

Peticionarios

Núm.

MC-2014-0140

SOBRE:

ADMISIÓN POR CORTESÍA AL  
AMPARO DE LA REGLA 12(F)  
DEL REGLAMENTO DEL TRIBUNAL  
SUPREMO

**SOLICITUD DE ADMISIÓN POR CORTESÍA**

AL HONORABLE TRIBUNAL:

**Comparecen** los abogados que componen la Parte Peticionaria de epígrafe y los licenciados admitidos al ejercicio de la abogacía en Puerto Rico, Anthony Murray y Ramón L. Rosario Cortés, y muy respetuosamente exponen, alegan y solicitan:

**I. Jurisdicción**

Este Honorable Tribunal tiene facultad para atender la presente petición al amparo de la Regla 12(f) del Reglamento del Tribunal Supremo de Puerto Rico<sup>1</sup>; y por lo resuelto por este Honorable Tribunal en Ex Parte Moylan, 2014 T.S.P.R. 47 y en In re: Alam M. Wolper, 2013 T.S.P.R. 86.

**II. Requisitos para la Solicitud de admisión por cortesía**

La Regla 12(f) del Reglamento de este Tribunal permite solicitar la admisión por cortesía para postular como abogado en Puerto Rico en casos especiales y en relación a abogados admitidos al ejercicio de la abogacía en un estado o territorio de Estados Unidos de América.

Dicha solicitud deberá ser endosada al menos por un abogado admitido al ejercicio de la profesión quien debe dar fe de la capacidad del abogado que realiza la petición. Debe unirse a la petición un certificado de acreditación del

<sup>1</sup> 4 L.P.R.A. Ap. XXI-B, R. 23(a).

tribunal de más alta jerarquía en la jurisdicción que le solicitante está admitido. Además, deberá acompañarse un sello de rentas internas de cuatrocientos dólares (\$400.00) por cada abogado interesado. Del abogado no dominar el idioma español, deberá acreditarse el hecho de que el solicitante postulará acompañado de un abogado del foro local que domine los idiomas español e inglés.

Siendo así, este honorable foro exige que se presente: (1) la solicitud; (2) la reseña profesional del solicitante; (3) la acreditación de la jurisdicción para la cual está admitido; (4) endoso por un abogado en Puerto Rico; (5) sellos de rentas internas por \$400; y (6) certificación de capacidad y de asistencia de abogado local en casos de que no domine el idioma español. Ex Parte Moylan, supra; In re: Alam M. Wolper, supra.

### **III. Solicitud de admisión por cortesía**

1) Doral Financial Corporation, Doral Bank, Doral Mortgage LLC, Doral Insurance Agency, Inc. y Doral Properties, Inc. (en adelante Doral), han iniciado un proceso de análisis legal para impugnar la postura del Departamento de Hacienda del Estado Libre Asociado de Puerto Rico que ha dado como nulo un Acuerdo Final o *Closing Agreement* de 2012 en detrimento de los derechos de Doral.

2) Dicha actuación tiene implicaciones en procesos regulatorios a nivel federal y local que involucra varias agencias gubernamentales en ambas jurisdicciones.<sup>2</sup>

3) Por tanto, un caso con tal especialidad y particularidad requiere la colaboración de todos los abogados de Doral que atienden las distintas ramificaciones de la situación provocada por el Departamento de Hacienda.

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<sup>2</sup> A manera de ejemplo, dicha situación requiere atender foros como el *Federal Deposit Insurance Corporation* (FDIC) y el *Securities and Exchange Commission* (SEC)

- 4) Por tanto, se solicita que este Foro admita previamente y por cortesía a los peticionarios en el proceso judicial correspondiente de ser el curso de acción a seguir.
- 5) Los peticionarios Charles A. Patrizia y Timothy L. Dickinson son abogados admitidos al ejercicio de la abogacía en otras jurisdicciones de los Estados Unidos como describen sus respectivas reseñas profesionales.<sup>3</sup>
- 6) Dichos peticionarios cumplen con los requisitos de su práctica en la jurisdicción de los Estados Unidos y tienen clasificación de *good standing*.<sup>4</sup>
- 7) Se incluye sellos de rentas internas por la cantidad total de \$800.00 a razón de \$400.00 por cada peticionario.
- 8) Los abogados admitidos en la jurisdicción de Puerto Rico, Anthony Murray y Ramón L. Rosario Cortés, endosan, certifican y dan fe que los peticionarios tienen la capacidad profesional para postular como abogados en el asunto correspondiente. Dicho endoso se hace constar con la firma de la presente solicitud.
- 9) Los licenciados Anthony Murray y Ramón L. Rosario Cortés dominan los idiomas español e inglés y estarán acompañado a los peticionarios en todo trámite del presente caso.

#### **IV. Súplica**

Por los fundamentos antes expuestos, muy respetuosamente, se solicita de este Honorable Tribunal que admita por cortesía a los peticionarios para ejercer la abogacía en Puerto Rico en el asunto descrito.

Respetuosamente Sometido.

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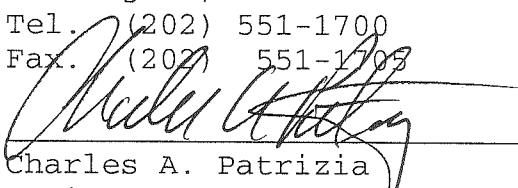
<sup>3</sup> Anejo 1.

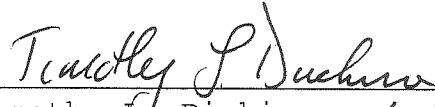
<sup>4</sup> Anejo 2.

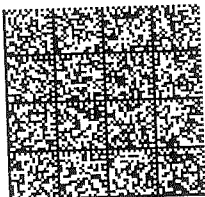
En San Juan, Puerto Rico, a 34 de mayo de 2014.

**PAUL HASTINGS, LLP**

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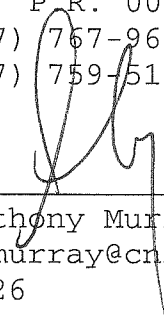
  
Timothy D. Dickinson *by CDP*  
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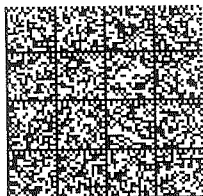
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Sello Rentas Internas  
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**Endosantes de la Petición:**

**Cancio, Nadal, Rivera & Díaz**  
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Lcdo. Ramón L. Rosario Cortés  
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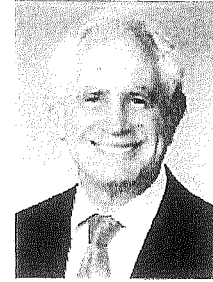
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Sello Rentas Internas  
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**Charles Patrizia** is a partner in the Litigation practice of Paul Hastings and is based in the firm's Washington, D.C. office. He has 30 years of experience in environmental and energy law, including federal regulatory and permitting requirements, and state regulatory and permitting requirements. He has an active litigation and counseling practice involving environmental, energy, project development, and permitting, as well as other commercial matters and government contracts. He represents clients in a range of international and national transactions involving energy, the environment, chemical and hazardous substances, and biotechnology.

Since joining the firm in 1985, Mr. Patrizia has represented clients on permitting, enforcement, regulatory, and legislative issues under the Federal Power Act, Public Utility Holding Company Act, Natural Gas Act, Clean Air Act, Clean Water Act, Superfund, and Resource Conservation and Recovery Act. He regularly advises clients on liability and related issues in enforcement proceedings and as part of business transactions; he leads the firm practice in relation to the interplay between projects and federal review requirements, including the National Environmental Policy Act, Endangered Species Act, and the National Historic Preservation Act. Mr. Patrizia has been the partner responsible for leading permitting and related development efforts for major greenfield and brownfield projects, working closely with client and Paul Hastings teams in the negotiation and organization of sites, contracting issues, bond financing (including industrial development and pollution control bonds), state and local incentives, and permitting.

### Charles A. Patrizia



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#### Speaking Engagements and Publications

- Coauthor, "Regulatory Conflicts Facing Electric Utilities under the Clean Air Act," *The Electricity Journal* (March 1992)
- Co-Author, "Can the Arkansas-Entergy-New Orleans Regional Planning Body Pass Muster?" *The Electricity Journal* (January/February 1992).
- Author, "*Parker v. Brown, a Preemption Analysis*," *Yale Law Journal* (1975)
- Lectured extensively on a variety of environmental and utility matters

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#### Professional and Community Involvement

- Member, the Council of the American Bar Association Section of Public Utility, Communications and Transportation Law
- Member, ABA Standing Committee on Environmental Law
- Member, the Section on Natural Resources, Energy and Environmental Law
- Instructor in trial advocacy tactics at the National Institute for Trial Advocacy

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#### Education

- Yale Law School, J.D., 1975
- University of North Carolina Chapel Hill, A.B., 1972

**Timothy L. Dickinson** is a partner in the Washington D.C. office with over 30 years' experience in the field of anti-corruption law. Mr. Dickinson's practice encompasses a number of areas, including all aspects of the Foreign Corrupt Practices Act, U.S. export laws, economic sanctions, ITAR regulations (including enforcement actions), and political risk insurance.

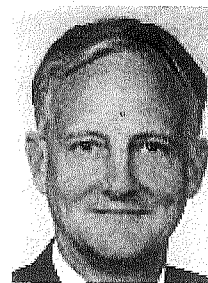
Mr. Dickinson works closely with a wide range of industries on FCPA matters, including establishment of compliance programs, due diligence in acquisitions, special investigations and defense before regulators in the U.S. as well as abroad, including the U.K.'s Serious Fraud Office. In 2005, he was appointed Independent Expert by Monsanto as part of a Deferred Prosecution Agreement with the Department of Justice and he recently concluded a three-year term as Independent Monitor in conjunction with a case settled in 2010. Mr. Dickinson was also selected by the World Bank to assist with the development of their Voluntary Disclosure Program, and participated with Bank staff in evaluating and recommending improvements to a VDP participant's compliance program. *Chambers USA 2009, 2010, 2011, 2012 and 2013* have recognized him among the very few attorneys ranked as top-tier FCPA experts; he was also named by Ethisphere at the top of their FCPA 2009 list of *Attorneys Who Matter*.

Mr. Dickinson also represents political risk insurance entities dealing with coverage issues, arbitration of disputes, and recovery activities. He has worked on major infrastructure projects in the Middle East and Asia and has represented foreign governments in matters involving public international law; including treaty rights, expropriation, and sovereign immunity.

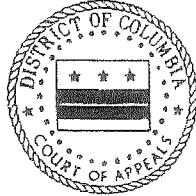
Mr. Dickinson was an adjunct professor of law at Georgetown University Law Center from 1983 to 1993. He is currently a Professor from Practice at The University of Michigan Law School where he teaches Transnational Law and International Commercial Transactions, and is a founding faculty member of the International Transactions Clinic, which gives students practical experience in international law. He served as the chair of the ABA Section of International Law and Practice in 1997-1998, has served on the Executive Council of the American Society of International Law and serves as Director of the International Law Institute's course on government integrity and anti-corruption initiatives. Mr. Dickinson is chairman of the ABA's International Legal Resource Center, which provides global legal assistance in conjunction with the United Nations Development Programme. He served as Co-Chair of the International Bar Association's Anti-Corruption Committee for 2012-2013.

Mr. Dickinson graduated from The University of Michigan law school in 1979 after completing his B.A. in 1975. He also studied at The Hague Academy of International Law in the Netherlands and L'Université d'Aix-Marseille in France and spent a brief period as an extern in the Office of the Legal Adviser of the Department of State. Following law school, he earned his LL.M. as a Jervoy Fellow at Columbia University. After finishing his LL.M. degree, Mr. Dickinson worked in the Legal Service of the Commission of the European Communities in Brussels, Belgium. Mr. Dickinson then returned to Washington, D.C., where he entered private practice.

## Timothy L. Dickinson



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District of Columbia Court of Appeals  
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202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

**CHARLES A. PATRIZIA**

*was on JUNE 25, 1976, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 20, 2014.*

JULIO A. CASTILLO  
Clerk of the Court

By: *Bonnie Hancock*  
Deputy Clerk



District of Columbia Court of Appeals  
Committee on Admissions  
430 F Street, N.W. — Room 123  
Washington, D. C. 20001  
202 / 879-2710

*I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that*

**TIMOTHY L. DICKINSON**

*was on JANUARY 13, 1981, duly qualified and admitted as an attorney and counselor entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.*

*In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 20, 2014 .*

JULIO A. CASTILLO  
Clerk of the Court

By: *Blandie Hancock*  
Deputy Clerk