

**IN THE UNITED STATES ARMY COURT OF CRIMINAL APPEALS**

UNITED STATES,

Appellee

**MOTION FOR LEAVE TO ALLOW  
STUDENT REPRESENTATION**

v.

Docket No. ARMY 20210382

Staff Sergeant (E-6)

**JEFF I. GORDON, Jr.,**

United States Army,

Appellant


Tried at Fort Leonard Wood, Missouri,  
on 12 April 2021, 27 April 2021, 7 June  
2021, and 28 June 2021, before a  
general court-martial convened by the  
Commander, United States Army  
Maneuver Support Center of  
Excellence, Lieutenant Colonel Jessica  
Conn, Military Judge, presiding.

**TO THE HONORABLE, THE JUDGES OF THE  
UNITED STATES ARMY COURT OF CRIMINAL APPEALS**

COMES NOW, undersigned appellate government counsel, pursuant to  
Rules 9.4(d)(4) and 23 of this honorable court's Rules of Appellate Procedure, and  
moves for leave to allow law student representation in the instant case.

Under the supervision of first undersigned counsel and other attorneys in the  
Government Appellate Division, Ms. Tayla Hall will serve as a legal intern for the  
Government Appellate Division for the summer while completing her legal  
education at The George Mason University Antonin Scalia Law School.


First undersigned counsel satisfies all supervisory attorney requirements of  
Rule 9.4(c) and views the instant case as an appropriate one for student  
representation. In turn, Ms. Hall satisfies all student eligibility requirements of  
Rule 9.4(b). As reflected in **Enclosure 1**, Ms. Hall is certified by Assistant Dean


 of George Mason University Antonin Scalia Law School as being of good character and competent legal ability. Similarly, as reflected in **Enclosures 2 and 3**, Ms. Hall's law school transcripts reflect that she has successfully completed at least four semesters of legal studies, including receiving a passing grade in criminal procedure and criminal law.

As such, and pursuant to Rule 9.4(e)(1), undersigned counsel moves for leave of this court to permit Ms. Hall to assist in the preparation of the government's brief in the instant case and sign the final government brief along with undersigned counsel. Pursuant to Rule 9.4(d)(1)–(2), undersigned counsel consent to Ms. Hall appearing on behalf of the United States on brief and consents to supervising Ms. Hall.

### **Conclusion**

WHEREFORE, the United States respectfully requests that this Honorable Court grant its motion for leave to allow student representation in the instant case.

  
VY/T. NGUYEN  
CPT, JA  
Appellate Attorney, Government  
Appellate Division

  
CHASE C. CLEVELAND  
MAJ, JA  
Branch Chief, Government  
Appellate Division

**MOTION FOR LEAVE  
TO ALLOW STUDENT  
REPRESENTATION:**

**PANEL NO. 2**

Granted: \_\_\_\_\_

Denied: \_\_\_\_\_

Date: \_\_\_\_\_

**CERTIFICATE OF SERVICE, U.S. v. GORDON (20210382)**

I certify a copy of the foregoing was sent via electronic submission to  
Mr. Peter Kageleiry, civilian appellate defense counsel, at [REDACTED],  
and the Defense Appellate Division, at [REDACTED]  
[REDACTED], on the 14th day of June 2024.

[REDACTED]  
DANIEL L. MANN  
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Government Appellate Division  
9275 Gunston Road  
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[REDACTED]