

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
ST. THOMAS AND ST. JOHN DIVISION**

SAVE CORAL BAY, INC.,
CORAL BAY COMMUNITY COUNCIL,
and DAVID SILVERMAN,

Plaintiffs,

NO. 3:26-cv-00042

UNITED STATES ARMY CORPS OF
ENGINEERS, the DISTRICT
COMMANDERS FOR THE
JACKSONVILLE DISTRICT OF THE
ARMY CORPS OF ENGINEERS,
MATTHEW A. WESTCOTT and
BRANDON BOWMAN (in their official
capacity), and the CHIEF, PALM BEACH
GARDENS SECTION, ARMY CORPS OF
ENGINEERS (in her official capacity),

Defendants.

MOTION FOR ADMISSION PRO HAC VICE OF ROBERT D. FOX

MELODY WESTFALL, counsel of record for Plaintiffs SAVE CORAL BAY, INC.,
CORAL BAY COMMUNITY COUNCIL, and DAVID SILVERMAN, respectfully moves this
Court pursuant to Local Rule 83.2 for an order admitting **ROBERT D. FOX** to appear pro hac
vice in the above-captioned matter. In support of this Motion, Melody Westfall states as follows:

I. Qualifications of Attorney Seeking Admission

1. Robert D. Fox is an attorney duly licensed and admitted to practice law in
Pennsylvania, New York, and New Jersey, having been admitted to the bar of Pennsylvania on
November 12, 1985, Bar Number 44322; New York on July 18, 2018, Bar Number 5589890;

New Jersey on August 27, 2019, Bar Number 259122019. He graduated from Harvard Law School.

2. Robert D. Fox maintains his principal office at Three Bala Plaza East, Suite 700, Bala Cynwyd, PA 19004.

3. Robert D. Fox's telephone number is 484-430-2312, and his email address is rfox@mankogold.com.

4. Robert D. Fox has not previously been admitted pro hac vice in this Court, is not a resident of the Virgin Islands, and does not regularly practice law in the Virgin Islands.

5. Robert D. Fox possesses specialized knowledge and experience in environmental law that will benefit Plaintiff and assist this Court in the resolution of this matter.

6. Specifically, Mr. Fox is a founder and senior member of one of the largest environmental law firms in the United States, was an adjunct professor of environmental law at Penn Carey law school for twenty-five years and has testified multiple times before the United States Senate on environmental issues.

II. Local Counsel Designation

Melody Westfall is an attorney admitted to practice before this Court, Bar Number R-2052, and maintains an office at Gallows Bay, 5032 Anchor Way, Suite 8, Christiansted, St Croix 00820. Melody Westfall hereby agrees to serve as local counsel of record in this matter and will be responsible for receiving all notices, orders, pleadings, and other papers filed in this action. Melody Westfall will be available to appear before the Court as required and will be familiar with the Local Rules of this Court and the rules of practice before this Court.

III. Statement of Good Standing

Robert D. Fox is in good standing and authorized to practice in all courts where he is admitted. He is not currently subject to any disciplinary proceedings in any jurisdiction and has not been disciplined by any court or bar association.

IV. Compliance with Local Rules

This Motion complies with all applicable requirements for admission pro hac vice. Robert D. Fox has read and is familiar with the Local Rules of this Court and the Federal Rules of Civil Procedure, and agrees to abide by all such rules and the standards of conduct required of members of the bar of this Court.

V. Prayer for Relief

WHEREFORE, Melody Westfall, on behalf of Plaintiff, respectfully requests that this Court enter an order:

- a. Granting Robert D. Fox permission to appear pro hac vice as counsel for Plaintiff in this action;
- b. Permitting Robert D. Fox to participate in all proceedings in this matter, including but not limited to motion practice, discovery, hearings, trial, and any appeals, subject to the supervision of local counsel; and
- c. Granting such other and further relief as the Court deems just and proper.

Dated: August 6, 2026

Respectfully submitted,

WESTFALL LAW PLLC

/s/ Melody D. Westfall, Esq.

Melody D. Westfall, Esq.

Attorney for Plaintiffs

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(340) 227-0017
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AFFIDAVIT OF ROBERT D. FOX
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE

I, Robert D. Fox, hereby declare and affirm under penalty of perjury that the following statements are true and correct:

1. I am an attorney duly licensed and admitted to practice law in Pennsylvania, New York, and New Jersey.
2. I am a member in good standing of the bar of each state in which I am admitted to practice and am not currently suspended or disbarred in any jurisdiction.
3. I have listed below all states and jurisdictions in which I am currently admitted to practice law:
 - a. Pennsylvania on November 12, 1985, Bar Number 44322;
 - b. New York on July 18, 2018, Bar Number 5589890;
 - c. New Jersey on August 27, 2019, Bar Number 259122019;
 - d. U.S. Court of Appeals for the Second Circuit on January 7, 1997;
 - e. U.S. Court of Appeals for the Third Circuit on February 16, 1995;
 - f. U.S. District Court for the District of New Jersey on March 12, 2020;
 - g. U.S. District Court for the Eastern District of Pennsylvania on December 16, 1986;
 - h. U.S. Supreme Court on August 29, 1997.
 - i. I am not currently subject to any disciplinary proceedings in any jurisdiction.
4. I have not been disciplined by any court, bar association, or other disciplinary authority.

5. I have read and am familiar with the Local Rules of the District Court of the Virgin Islands and the Federal Rules of Civil Procedure, and I agree to comply with all such rules and with the standards of professional conduct required of attorneys appearing before this Court.
6. I understand that by appearing pro hac vice in this matter, I submit myself to the jurisdiction of this Court and its disciplinary authority for all purposes related to this case.
7. I understand that Melody Westfall, Esq., will serve as local counsel of record in this matter and that all notices, orders, pleadings, and other papers may be served upon Melody Westfall.
8. I have applied or intend to apply for admission pro hac vice in no other matters pending in the District Court of the Virgin Islands.
9. I have not been admitted pro hac vice in the District Court of the Virgin Islands in any other matters.
10. My principal office address is Three Bala Plaza East, Suite 700, Bala Cynwyd, PA 19004.
11. My telephone number is 484-430-2312, and my email address is rfox@mankogold.com.
12. I agree to notify this Court promptly of any change in my status or qualifications as set forth in this Affidavit.
13. I declare under penalty of perjury under the laws of the United States Virgin Islands that the foregoing is true and correct.


Robert Fox