

IN THE SUPREME COURT OF OHIO

City of Toledo,

Appellant,

v.

Paul Tellings,

Appellee.

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Supreme Court Case No. 06-0690

On Appeal from the Lucas County  
Court of Appeals,  
Sixth Appellate District

MOTION TO APPEAR *PRO HAC VICE* ON BEHALF OF  
AMERICAN SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS  
(ASPCA) FOR PURPOSE OF FILING MERIT BRIEF OF *AMICUS CURIAE*  
IN SUPPORT OF APPELLEE PAUL TELLINGS

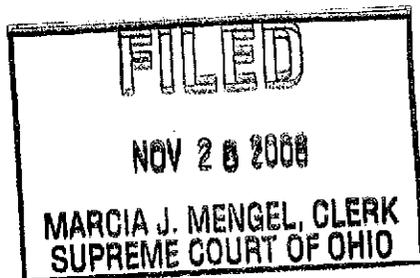
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OHIO AS REQUIRED BY  
OHIO SUPREME COURT RULE I,  
SECTION 2

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COUNSEL FOR APPELLANT



Pursuant to Ohio Supreme Court Rule I, Section 2, the undersigned counsel, Scott J. Saum, respectfully moves the court for an order granting admission *pro hac vice* to Debora M. Bresch for the purpose of filing a Merit Brief of *Amicus Curiae* on behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) in support of Appellee Paul Tellings in the above-styled cause only. In support of this motion, the undersigned states:

1. Debora M. Bresch is admitted to practice in the highest Court of the State of New York and was admitted in February 1999 (NYS registration number: 2991339).
2. Debora M. Bresch is not currently under suspension or subject to other disciplinary action with respect to the practice of law.

WHEREFORE, the undersigned counsel respectfully requests this court enter an order of admission *pro hac vice* to Debora M. Bresch for purposes of this cause only.

Respectfully submitted,

 (authorized by S.J.S.)  
Scott J. Saum (0001330)

 (authorized by S.Z.)  
Sol Zynder (0002398)

**CERTIFICATION**

This is to hereby certify that copy of the foregoing Motion to Appear Pro Hac Vice was sent by ordinary U.S. Mail, postage prepaid, this 28th day of November 2006 to **Stephen P. Carney**, State Solicitor, Counsel of Record, 30 East Broad St., 17<sup>th</sup> Fl., Columbus, Ohio 43215, and **Adam Loukx**, City of Toledo Law Department, Counsel of Record, One Government Center, Suite 1710, Toledo, Ohio 43604.

  
Scott J. Saum (0001330) (authorized by S.J.S.)

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ORDER

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This day motion was made on behalf of Debora M. Bresch who seeks admission *pro hac vice* for the purpose of filing a Merit Brief of *Amicus Curiae* on behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) in support of Appellee Paul Tellings, and for good cause, said motion is hereby GRANTED.

IT IS ORDERED ADJUDGED AND DECREED that Debora M. Bresch shall be granted admission *pro hac vice* for the purpose of filing a Merit Brief of *Amicus Curiae* on behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) in support of Appellee Paul Tellings.

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JUDGE