

IN THE SUPREME COURT OF OHIO

IN RE: COREY SPEARS : CASE NO. 06-1074  
A Minor Child : On appeal from the Fifth  
: Appellate District, Licking County,  
: Case No. 2005-CA-93

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**MOTION FOR ADMISSION PRO HAC VICE**

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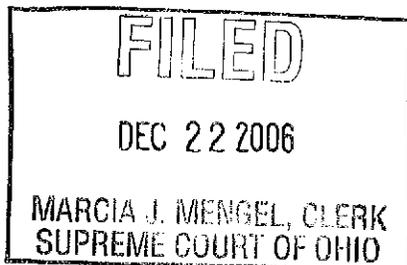
Appellant Corey Spears respectfully requests this Court to admit Marsha L. Levick, Esq., a licensed attorney in Pennsylvania, as counsel *pro hac vice* to appear as counsel for *Amicus Curiae* Juvenile Law Center, *et al.*, in support of Mr. Spears in the pending appeal in this matter. The reasons supporting this motion are set forth in the attached memorandum.

Respectfully submitted,

DAVID H. BODIKER #0016590  
Ohio Public Defender

  
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JILL E. BEELER #0069459  
Assistant State Public Defender

Office of the Ohio Public Defender  
8 East Long Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215  
(614) 466-5394  
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## MEMORANDUM IN SUPPORT

Jill E. Beeler, Esq., an attorney admitted to practice in the state of Ohio and registered with the Attorney Registration Section for active status, presents this application to the Court pursuant to Rule I.2. of the Rules of Practice of the Supreme Court of Ohio.

Marsha L. Levick, Esq., is the legal director of the Juvenile Law Center in Philadelphia, Pennsylvania. Attorney Levick's Pennsylvania Bar number is 22535. She has been a member in good standing of the bar of the Supreme Court of Pennsylvania since 1976. Attorney Levick also is admitted to practice and is a member in good standing of the United States Court of Appeals for the Third, Sixth, and Seventh Circuits, and the United States Supreme Court.

As counsel for the Juvenile Law Center, Attorney Levick has an expertise in various legal issues affecting minor defendants in criminal and juvenile delinquency proceedings. Attorney Levick has submitted *amicus* briefs in support of minor defendants in criminal and juvenile delinquency cases before the United States Supreme Courts and a number of state appellate and supreme courts, including California, Florida, and Wisconsin. *See, e.g., Roper v. Simmons*, 125 S.Ct. 1183 (2005) (brief of *Amici Curiae* Juvenile Law Center, *et al.*, available at [www.jlc.org](http://www.jlc.org)); *Yarborough v. Alvarado*, 124 S.Ct. 1706 (2004) (brief of *Amici Curiae* Juvenile Law Center, *et al.*, available at [www.jlc.org](http://www.jlc.org)); *In re Geroe T.*, 93 P.3d 1007 (Cal. 2004); *Tate v. State of Florida*, 864 So.2d 44 (Fla. Dist. Ct. App. 2003); *Maunduley v. Superior Court of California*, 41 P.3d 3 (Cal. 2002); *In the Interest of Douglas D.*, 626 N.W.2d 725 (Wis. 2001).

Therefore, Corey Spears respectfully asks this Court to admit Marsha L. Levick, Esq. as counsel *pro hac vice* to appear as counsel for *Amicus Curiae* Juvenile Law Center, *et al.*, in support of Mr. Spears in the pending appeal in this matter.

Respectfully submitted,

DAVID H. BODIKER #0016590  
Ohio Public Defender



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### CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing MOTION FOR ADMISSION *PRO HAC VICE* was forwarded by regular U.S. Mail this 22 day of December 2006 to the office of Eric Welch, Esq., County Assistant Prosecutor, Licking County Prosecutor's Office, 20 South Second Street, Newark, Ohio 43055.



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JILL E. BEELER #0069459  
Assistant State Public Defender