

IN THE SUPREME COURT OF OHIO

Allstate Insurance Company, as subrogee of  
Margaret Harris and Anna Kaplan,

Appellant,

v.

Cleveland Electric Illuminating Company,

Appellee.

CASE NO:

**07 - 0452**

On Appeal from the Cuyahoga  
County Court of Appeals,  
Eight Appellate District

Court of Appeals  
Case No. CA-06-087781

---

MOTION FOR ORDER GRANTING *PRO HAC VICE*  
APPEARANCE AND ORDER THEREON

---

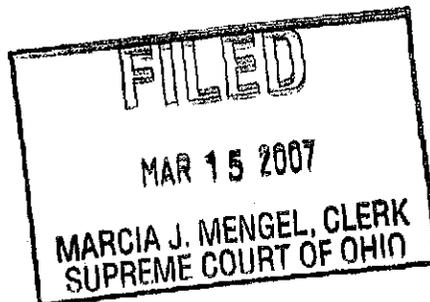
Lynn K. Weaver  
*Counsel of Record*  
Mark S. Grotefeld  
Grotefeld & Denenberg, LLC  
2300 The Clark Adams Building  
105 West Adams Street  
Chicago, Illinois 60603  
(312) 551-0200  
(312) 601-2402 (fax)  
Email: [lkw@gd-llc.com](mailto:lkw@gd-llc.com)

Leslie E. Wargo (0073112)  
McCarthy, Lebit, Crystal & Liffman Co., LPA  
1800 Midland Building  
101 Prospect Avenue, West  
Cleveland, Ohio 44115  
(216) 696-1422  
(216) 696-1210 (fax)  
Email: [lew@mccarthylebit.com](mailto:lew@mccarthylebit.com)

COUNSEL FOR APPELLANT

Thomas I. Michals (0040822)  
Deneen Lamonica (0073500)  
Anthony F. Stringer (0071691)  
Calfee, Halter & Griswold, LLP  
1400 McDonald Investment Center  
800 Superior Avenue  
Cleveland, Ohio 44114-2688  
(216) 622-8450  
(216) 241-0816 (fax)  
Email: [tmichals@calfee.com](mailto:tmichals@calfee.com)

COUNSEL FOR APPELLEE

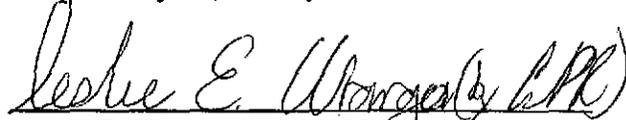


On behalf of Appellant, Allstate Insurance Company, as subrogee of Margaret Harris and Anna Kaplan, Leslie E. Wargo, Esq. hereby moves this Court to permit Mark S. Grotefeld, Esq., of Grotefeld & Denenberg, LLC, 105 West Adams Street, Suite 2300, Chicago, Illinois 60603, to appear *pro hac vice* in this action on behalf of Appellant, and as grounds states as follows:

1. Mark S. Grotefeld is a non-resident of the State of Ohio.
2. Mark S. Grotefeld has read and become familiar with the *Ohio Rules of Civil Procedure* and the Rules of Practice of the Supreme Court of Ohio. See Exhibit A, Affidavit of Mark S. Grotefeld.
3. Mark S. Grotefeld is a member in good standing of the Supreme Court of the State of Illinois and the Northern District of Illinois.
4. Attorney Leslie E. Wargo, is a member in good standing of the bar of this court, has been retained to assist in representing Appellant Allstate Insurance Company. Ms. Wargo is an attorney at McCarthy, Lebit, Crystal & Liffman, Co., L.P.A.

WHEREFORE, for the reasons stated above, this Court should permit Mark S. Grotefeld, Esq. to appear *pro hac vice* in this case on behalf of Appellant, Allstate Insurance Company.

Respectfully submitted,



Leslie E. Wargo (#0073112)

[lew@mccarthylebit.com](mailto:lew@mccarthylebit.com)

McCARTHY, LEBIT, CRYSTAL  
& LIFFMAN CO., L.P.A.

101 Prospect Avenue, West  
1800 Midland Building  
Cleveland, Ohio 44115  
(216) 696-1422  
(216) 696-1210 (fax)

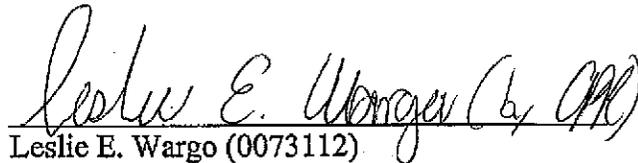


Lynn K. Weaver  
Mark S. Grotefeld  
Grotefeld & Denenberg, L.L.C.  
Illinois State Bar No.: 6270201  
105 West Adams Street, Suite 2300  
Chicago, Illinois 60603  
(312) 551-0200

Attorneys for Appellant, Allstate Insurance  
Company, as subrogee of Margaret Harris and Anna  
Kaplan

Certificate of Service

I hereby certify that a copy of the Motion for Order Granting *Pro Hac Vice* Appearance and Order Thereon was sent by regular U.S. mail on the 14<sup>th</sup> day of March, 2007, to Thomas I. Michals, Esq., Deneen Lamonica, Esq., and Anthony F. Stringer, Esq., Counsel for Appellee, at Calfee, Halter & Griswold, LLP, 1400 McDonald Investment Center, 800 Superior Avenue, Cleveland, Ohio 44114-2688.



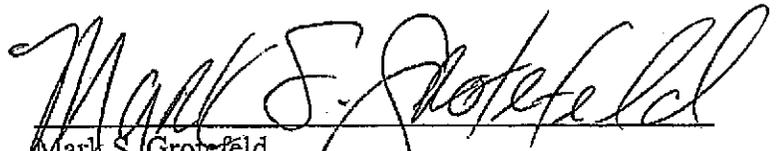
Leslie E. Wargo (0073112)



STATE OF ILLINOIS )  
 ) SS.  
COUNTY OF COOK )

I, Mark S. Grotefeld, hereby apply to the Court for permission to appear and participate in the above-entitled action on behalf of Appellant, Allstate Insurance Company as subrogee of Margaret Harris and Anna Kaplan, by whom I have been retained.

1. I am a member in good standing and eligible to practice before the highest court of the State of Illinois.
2. I have never been censured, suspended, disbarred or otherwise disciplined by any court.
3. I have never been the subject of an investigation of professional conduct.
4. I have never been transferred to inactive status, voluntarily withdrawn or resigned from the bar of any court.
5. I have never been denied admission to any bar of any court.
6. I have never been held in contempt of court.
7. I agree and have reviewed the local rules of the court and agree to submit and comply with all the provisions contained therein.
8. I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Mark S. Grotefeld  
Grotefeld & Denenberg, LLC  
105 West Adams, Suite 2300  
Chicago, IL 60603  
(312) 551-0200

Subscribed and Sworn to before me this 14th day of March, 2007.



  
\_\_\_\_\_  
Notary Public