

No 2007-**07-0739**

In the Supreme Court of Ohio

ENVIRONMENTAL NETWORK CORP., ET AL.,

Plaintiffs-Appellees

v.

GOODMAN WEISS MILLER, L.L.P., ET AL.,

Defendant-Appellant.

ON DISCRETIONARY APPEAL FROM THE
COURT OF APPEALS, EIGHTH APPELLATE DISTRICT
CUYAHOGA COUNTY, OHIO
CASE No CA-06-087782

**MOTION FOR ADMISSION PRO HAC VICE
ON BEHALF OF RICHARD A. SIMPSON, ESQ.**

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FILED

APR 25 2007

MARCIA J. MENGEL, CLERK
SUPREME COURT OF OHIO

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Attorneys for Plaintiffs-Appellees

Motion to Admission Pro Hac Vice on Behalf of Richard A. Simpson, Esq.

Pursuant to Rule I, Section 2 of the Supreme Court Rules of Practice, Defendant-Appellant, Goodman Weiss Miller LLP, through its attorney, Monica A. Sansalone, Esq., respectfully moves this Court for admission pro hac vice of Richard A. Simpson, Esq. of Ross, Dixon & Bell, LLP, 2001 K Street, N.W., Washington, D.C., 20006-1040, (telephone: (202) 662-2000 and facsimile: (202) 662-2190).

The purpose of this motion is to allow Mr. Simpson to appear and serve as co-counsel for Goodman Weiss Miller LLP in the appeal proceedings before this Court, including with respect to the submission of briefs and participation in oral argument should this Court exercise its discretionary jurisdiction herein. Mr. Simpson was admitted pro hac vice by the Eighth District Court of Appeals for the purposes of the underlying appeal on behalf of Goodman Weiss Miller LLP.

Mr. Simpson is a partner with the law firm of Ross, Dixon & Bell, LLP. He is admitted to the practice of law, and is in good standing, in the District of Columbia, State of Illinois, State of Maryland and Commonwealth of Virginia. Mr. Simpson has never been disciplined, nor has a grievance been filed against him.¹ Mr. Simpson has read and agreed to be bound by the Ohio Rules of Professional Conduct adopted by the Supreme Court of Ohio.

Counsel seeking this order, Ms. Sansalone, is an attorney admitted to practice in Ohio and is currently registered with the Attorney Registration Section for active status and is in good standing. Accordingly, Goodman Weiss Miller LLP, and its attorney, respectfully requests that this Court grant admission pro hac vice for Mr. Simpson with respect to the discretionary appeal.

¹See Affidavit of Richard A. Simpson attached hereto as Exhibit "A".

Respectfully submitted,



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Attorney for Appellant

Goodman Weiss Miller LLP

CERTIFICATE OF SERVICE

A true copy of the foregoing *Motion to Admission Pro Hac Vice on Behalf of Richard A. Simpson, Esq.* was sent by United States Mail, postage pre-paid, this 24th day of April, 2007 upon the following:

Joel Levin, Esq. (0010671)
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Attorneys for Plaintiffs-Appellees


MONICA A. SANSALONE (0065143)

AFFIDAVIT OF RICHARD A. SIMPSON, ESQ.
IN SUPPORT OF ADMISSION PRO HAC VICE

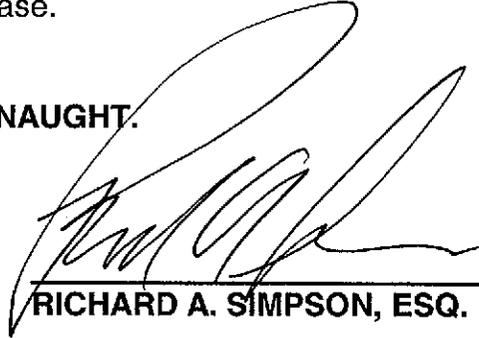
I, **Richard A. Simpson**, being first duly sworn, depose and say as follows:

1. I am a partner at the law firm Ross, Dixon & Bell, LP, located at 2001 K Street, NW, Washington, D.C., 20006-1040.
2. I am admitted to the practice of law in the District of Columbia, State of Illinois, State of Maryland and Commonwealth of Virginia.
3. I am admitted to practice before the following courts:
 - U.S. District Court - District of Columbia
 - U.S. District Court - N.D. Illinois
 - U.S. District Court - Maryland
 - U.S. District Court - E.D. Virginia
 - U.S. Court of Appeals - 1st Circuit
 - U.S. Court of Appeals - 2nd Circuit
 - U.S. Court of Appeals - 3rd Circuit
 - U.S. Court of Appeals - 4th Circuit
 - U.S. Court of Appeals - 5th Circuit
 - U.S. Court of Appeals - 6th Circuit
 - U.S. Court of Appeals - 7th Circuit
 - U.S. Court of Appeals - 8th Circuit
 - U.S. Court of Appeals - 9th Circuit
 - U.S. Court of Appeals - District of Columbia Circuit
 - U.S. Supreme Court
4. I certify that I am currently a member in good standing in all jurisdictions listed in Paragraph 2.
5. I certify that I have never been suspended, disbarred or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction.
6. I certify that there are no disciplinary proceedings presently pending against me in any jurisdiction.
7. I certify that good cause exists for this appearance. I have maintained an attorney-client relationship with Defendant, Goodman Weiss Miller, LP, since the verdict was rendered against it in October of 2005, and was specifically retained to provide legal representation in connection with the appeal in this matter, including to the Supreme Court of Ohio.

EXHIBIT "A"

8. I have read and agree to be bound by the Ohio Rules of Professional Conduct adopted by the Supreme Court of Ohio, and I consent to the jurisdiction of the State of Ohio, the Supreme Court of Ohio, and the Board of Commissioners on Grievances and Discipline of the Supreme Court of Ohio to resolve any disciplinary matter that might arise as a result of the representation.
9. I respectfully request that this Court grant me admission pro hac vice for the purposes of the appeal in this case.

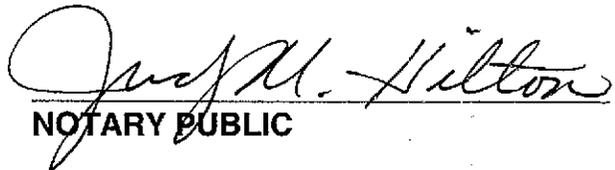
FURTHER AFFIANT SAYETH NAUGHT.



RICHARD A. SIMPSON, ESQ.

23rd

SWORN TO BEFORE ME and subscribed in my presence this day of April, 2007.



NOTARY PUBLIC

JUDY M. HILTON
NOTARY PUBLIC
DISTRICT OF COLUMBIA
My Commission Expires June 14, 2007