

IN THE SUPREME COURT OF OHIO

SHARON WILBORN, et al. ) CASE NO. 07-0558  
 )  
Plaintiffs-Appellants ) ON APPEAL FROM THE SEVENTH  
 ) DISTRICT COURT OF APPEALS,  
vs. ) MAHONING COUNTY CASE NO.  
 ) 04 MA 182  
BANK ONE CORPORATION, et al. )  
 )  
Defendants-Appellees )

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MOTION TO ADMIT PRO HAC VICE

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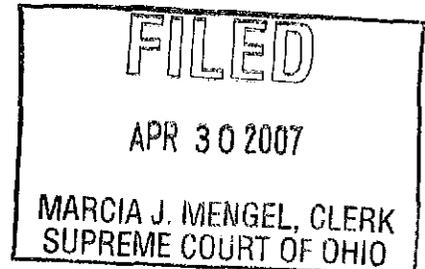
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and

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JAMES C. MARTIN  
DAVID J. BIRD

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FARGO HOME MORTGAGE, INC., WASHTENAW MORTGAGE,  
MORTGAGE ELECTRONIC REGISTRATION SYSTEM, INC. AND  
CHASE MANHATTAN MORTGAGE CORPORATION



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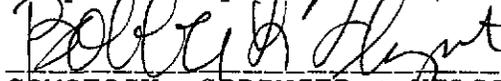
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Now come the defendants Bank One, N.A. (Ohio), Principal Residential Mortgage, Inc., Ameriquest Mortgage Company, Wells Fargo Home Mortgage, Inc., Washtenaw Mortgage Company and Mortgage Electronic Registration Systems, Inc., and move this court for an order admitting Perry A. Napolitano, Joseph E. Culleiton, David J. Bird and James C. Martin *pro hac vice* to serve as co-counsel with Attorney Lawrence R. Springer and Attorney Bobbie L. Flynt.

For cause, Attorneys Napolitano, Culleiton, Bird and Martin should be admitted *pro hac vice* because there is a long-standing relationship between several defendants and Reed Smith LLP, with whom the above attorneys practice. Furthermore, Attorneys Napolitano, Culleiton, Bird and Martin are attorneys in good standing and are admitted to practice law in Pennsylvania.

In support of this motion, defendants rely upon the attached affidavits.

Respectfully submitted,



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AMERIQUEST MORTGAGE COMPANY,

WELLS FARGO HOME MORTGAGE, INC.,

WASHTENAW MORTGAGE COMPANY AND

MORTGAGE ELECTRONIC REGISTRATION

SYSTEMS, INC. AND CHASE MANHATTAN

MORTGAGE COMPANY

COMMONWEALTH OF PENNSYLVANIA )  
COUNTY OF ALLEGHENY )

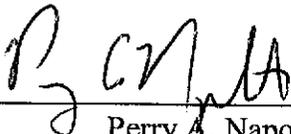
ss: AFFIDAVIT OF PERRY A.  
NAPOLITANO

Now comes Perry A. Napolitano, having been duly sworn, who deposes and says:

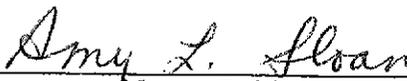
1. I make this affidavit of my own personal knowledge and I am legally competent to testify to the matter recited herein.

2. I am an attorney in good standing and I am admitted to practice law in the Commonwealth of Pennsylvania. I have never been the subject of disciplinary proceedings in any jurisdiction where I have practiced law.

3. I practice law with Reed Smith LLP, with whom several of the defendants have a long-standing relationship.

  
\_\_\_\_\_  
Perry A. Napolitano

Sworn to before me and subscribed in my presence this 26<sup>th</sup> day of April, 2007.

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

COMMONWEALTH OF PENNSYLVANIA  
Notarial Seal  
Amy L. Sloan, Notary Public  
City Of Pittsburgh, Allegheny County  
My Commission Expires Sept. 9, 2008  
Member, Pennsylvania Association Of Notaries

COMMONWEALTH OF PENNSYLVANIA )  
 )  
COUNTY OF ALLEGHENY )

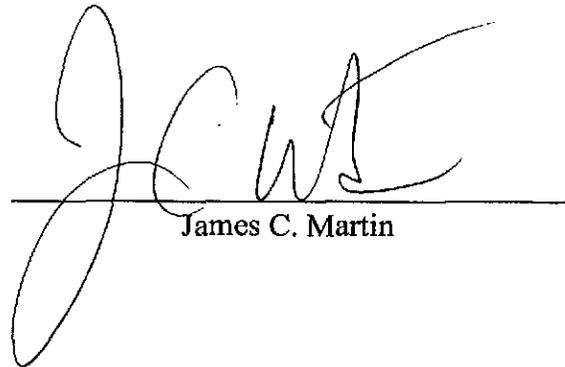
ss: AFFIDAVIT OF JAMES C.  
MARTIN

Now comes James C. Martin, having been duly sworn, who deposes and says:

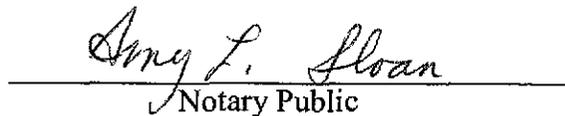
1. I make this affidavit of my own personal knowledge and I am legally competent to testify to the matter recited herein.

2. I am an attorney in good standing and I am admitted to practice law in the Commonwealth of Pennsylvania. I have never been the subject of disciplinary proceedings in any jurisdiction where I have practiced law.

3. I practice law with Reed Smith LLP, with whom several of the defendants have a long-standing relationship.

  
James C. Martin

Sworn to before me and subscribed in my presence this 27<sup>th</sup> day of April, 2007.

  
Notary Public

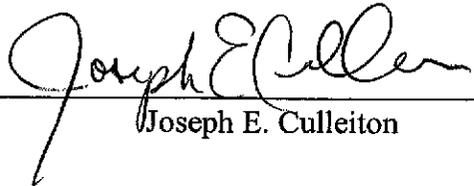
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My Commission Expires Sept. 9, 2008  
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COMMONWEALTH OF PENNSYLVANIA )  
 )  
COUNTY OF ALLEGHENY )

ss: JOSEPH E. CULLEITON

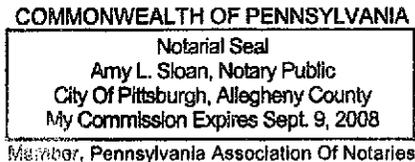
Now comes Joseph E. Culleiton, having been duly sworn, who deposes and says:

1. I make this affidavit of my own personal knowledge and I am legally competent to testify to the matter recited herein.
  
2. I am an attorney in good standing and I am admitted to practice law in the Commonwealth of Pennsylvania. I have never been the subject of disciplinary proceedings in any jurisdiction where I have practiced law.
  
3. I practice law with Reed Smith LLP, with whom several of the defendants have a long-standing relationship.

  
\_\_\_\_\_  
Joseph E. Culleiton

Sworn to before me and subscribed in my presence this 26<sup>th</sup> day of April, 2007.

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



COMMONWEALTH OF PENNSYLVANIA )  
COUNTY OF ALLEGHENY )

ss: AFFIDAVIT OF DAVID J. BIRD

Now comes David J. Bird, having been duly sworn, who deposes and says:

1. I make this affidavit of my own personal knowledge and I am legally competent to testify to the matter recited herein.

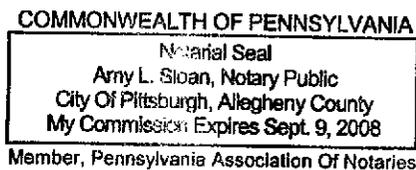
2. I am an attorney in good standing and I am admitted to practice law in the Commonwealth of Pennsylvania. I have never been the subject of disciplinary proceedings in any jurisdiction where I have practiced law.

3. I practice law with Reed Smith LLP, with whom several of the defendants have a long-standing relationship.

  
David J. Bird

Sworn to before me and subscribed in my presence this 26<sup>th</sup> day of April, 2007.

  
Notary Public



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27<sup>th</sup> day of April, 2007, a true and correct copy of the foregoing was served by first class mail upon the following:

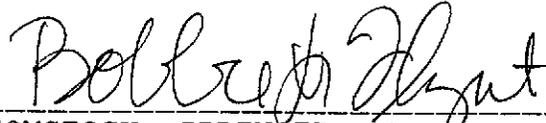
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Respectfully submitted,



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