

IN THE SUPREME COURT OF OHIO

---

**GENEVIEVE DICENZO, Executrix of the** :  
**Estate of JOSEPH DICENZO, Deceased,** : Case No. 07-1628  
**and GENEVIEVE DICENZO, in Her Own** :  
**Right,** : On Appeal From the  
Appellee, : Cuyahoga County  
: Court of Appeals,  
v. : Eighth Appellate District  
: :  
**A-BEST PRODUCTS CO., INC., ET AL.,** : Court of Appeals Case No. CA 06-088583  
Appellants :  
:

---

MOTION TO ADMIT MARK A. BEHRENS PRO HAC VICE

---

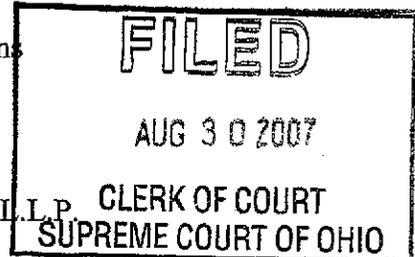
Pursuant to Rule I of the Ohio Supreme Court Rules of Practice, I, Victor E. Schwartz, an attorney in good standing admitted to practice before this Court, move for the admission pro hac vice of Mark A. Behrens to the bar of this Court for the purpose of representing *amici curiae* Coalition for Litigation Justice *et al.* until the final determination of this cause. In support of this motion, I submit the following information:

(a) Full name of the attorney to be admitted: Mark A. Behrens

(b) Contact information of the attorney to be admitted:

Home:  
4013 Mansion Drive, NW  
Washington, DC 20036

Office:  
Shook, Hardy & Bacon L.L.P.  
Hamilton Square,  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005  
Tel: (202) 639-5621  
Fax: (202) 783-4211  
mbehrens@shb.com



(c) The attorney to be admitted was admitted to the Virginia bar in 1990 and the District of Columbia bar in 1991.

(d) The attorney to be admitted is a member in good standing of all bars to which he is admitted and is not under suspension or disbarment from any bar.

(e) The attorney to be admitted does not engage in the practice of law from an office located in Ohio.

Mr. Behrens attests under the penalty of perjury the truth and accuracy of the foregoing facts, and based on such attestation, Movant respectfully requests that this motion be granted and that Mr. Mark A. Behrens be admitted pro hac vice to the bar of this Court to appear in the instant matter.

Respectfully submitted,



---

Victor E. Schwartz (0009240)  
SHOOK, HARDY & BACON, L.L.P.  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005  
Tel: (202) 783-8400  
Fax: (202) 783-4211



---

Mark A. Behrens  
SHOOK, HARDY & BACON, L.L.P.  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005-2004  
Tel: (202) 783-8400  
Fax: (202) 783-4211

Dated: August 29, 2007

**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing Motion upon counsel by depositing a copy in a first-class postage-prepaid envelope into a depository under the exclusive care and custody of the United States Postal Service this 29<sup>th</sup> day of August, 2007, addressed as follows:

Ruth A. Antinone  
WILLMAN & ARNOLD, L.L.P.  
705 McKnight Park Drive  
Pittsburgh, PA 15237

Mark C. Meyer  
Diana Nickerson Jacobs  
GOLDBERG, PERSKY & WHITE, P.C.  
1030 Fifth Avenue, Third Floor  
Pittsburgh, PA 15219-6295

John J. Duffy  
JOHN J. DUFFY & ASSOCIATES  
23823 Lorain Road, Suite 270  
North Olmstead, OH 44070



---

Victor E. Schwartz (0009240)  
SHOOK, HARDY & BACON, L.L.P.  
600 14th Street, N.W., Suite 800  
Washington, D.C. 20005  
Tel: (202) 783-8400  
Fax: (202) 783-4211

Dated: August 29, 2007