

**In the
Supreme Court of Ohio**

STATE OF OHIO,	:	Case No. 2007-0754
	:	
Plaintiff- Appellant	:	
	:	On Appeal from the
vs.	:	Clark County
	:	Court of Appeals
WILLIAM NUCKLOS, M.D.	:	2 nd Appellate District
	:	
Defendant-Appellee.	:	Court of Appeals Case
	:	No. 06-CA-23

VERIFIED MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE*

COMES NOW, Larry W. Zukerman, Esq., and respectfully represents the following:

1. Larry W. Zukerman, a member in good standing of the bar of this Court and in Ohio, respectfully requests permission for John P. Flannery, II to appear *pro hac vice* in the above-styled matter.

2. John P. Flannery, II resides at Ithaca Manor, 38469 Triticum Lane, Lovettsville, Virginia 20180, Phone: 540-822-3975 and is not a resident of Ohio.

3. Mr. Flannery is an attorney and a member of the law firm of Campbell, Miller, Zimmerman, P.C. with offices at 19 East Market Street, Leesburg, VA 20176, Phone: 703-771-8344.

FILED
SEP 13 2007
CLERK OF COURT
SUPREME COURT OF OHIO

4. Mr. Flannery is a former appellate law clerk, former federal and state prosecutor, and former special counsel to the United States Senate and House of Representatives; he is now engaged in private practice in civil and criminal litigation.

5. Mr. Flannery has been retained personally by William Nucklos, M.D., and as a member of the above-named law firm, to provide legal representation and did appear in connection with the appeal before the Court of Appeals Second District of Ohio, Clark County that is now pending before this Court in connection with the State's memorandum in support of jurisdiction.

6. Mr. Flannery is an active member in good standing and currently eligible to practice law in the following jurisdiction(s):

Virginia, 1983

District of Columbia, 1983

New York, 1973

U.S. District Court Eastern District of Virginia, 1984

U.S. District Court Southern District of New York

U.S. District Court Western District of Virginia

U.S. District Court of the District of Columbia

U.S. District Court Eastern District of New York

U.S. District Court Northern District of Florida

U.S. Bankruptcy Court, Southern District of New York, 1973

U.S. Court of Appeals, Second Circuit, 1973

U.S. Court of Appeals, Third Circuit, 2007

U.S. Court of Appeals, Fourth Circuit, 1985

U.S. Court of Appeals, Sixth Circuit, 2006

U.S. Court of Appeals, Ninth Circuit, 2006

U.S. Court of Appeals, Eleventh Circuit, 2006

U.S. Bankruptcy Court, Eastern District of Virginia

U.S. Supreme Court, 1985

7. There are no disciplinary proceedings pending against Mr. Flannery; nor have there been.

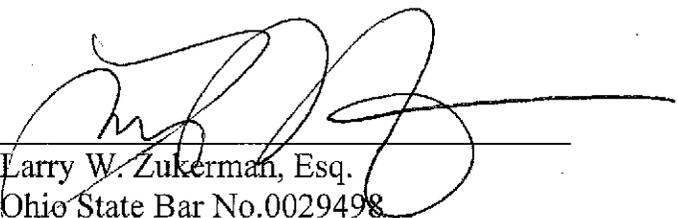
8. Mr. Flannery has filed only one previous motion that was granted to appear as counsel in the Ohio State Courts and that was to appear to argue the case before the Court of Appeals, Second District, in relation to this same matter.

9. I shall serve as local counsel of record, associated with Mr. Flannery in this matter. I am a member of the law firm of ZUKERMAN DAIKER & LEAR CO., LPA, Ohio Bar Number 0029498 and, as already stated above, an active member in good standing of the Ohio Bar of this Court. Our mailing address is 3912 Prospect Avenue, Cleveland OH 44115, Phone No. 216-696-0900.

10. Mr. Flannery's signature below reflects his agreement to comply with the provisions of the Ohio Rules of Professional Conduct and the Rules of this Court and consents to the jurisdiction of the Courts and to the Bar of the State of Ohio.

Wherefore, Larry W. Zukerman respectfully moves Mr. Flannery's admission *pro hac vice* to appear in this court and for this case only and hereby consents to be associated as local counsel of record in this cause.

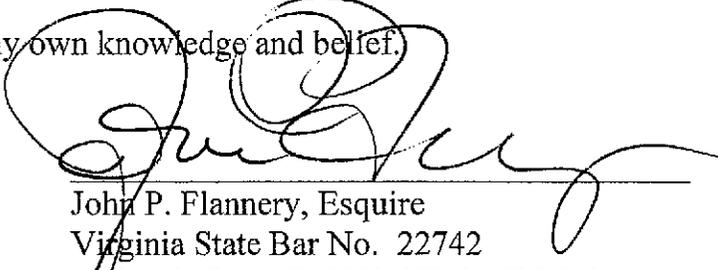
Dated this 12TH day of September 2007.



Larry W. Zukerman, Esq.
Ohio State Bar No.0029498
ZUKERMAN DAIKER & LEAR CO., LPA
3912 Prospect Avenue
Cleveland OH 44115
telephone: 216-696-0900
facsimile: 216-696-8800

COMMONWEALTH OF VIRGINIA
COUNTY OF LOUDOUN

I, **John P. Flannery, II, Esq.**, do hereby swear or affirm under penalty of perjury that I am the Mr. Flannery in the above-styled matter, that I have read the foregoing Motion and know the contents thereof, agree to comply with the provisions therein stated, and the contents are true of my own knowledge and belief.

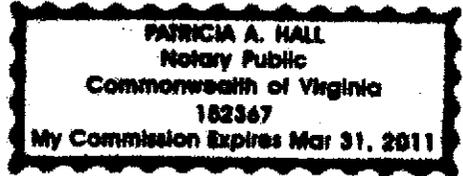


John P. Flannery, Esquire
Virginia State Bar No. 22742
CAMPBELL MILLER ZIMMERMAN
19 E. Market Street
Leesburg VA 20176
telephone: 703-771-8344
facsimile: 703-777-1485

The foregoing instrument was acknowledged before me this 11th day of September 2007 by John P. Flannery, II, Esq. who is personally known to me and who did take an oath.

11th day of September 2007.
Patricia A. Hall Notary Public
Notary Public (Signature)

Patricia A. Hall
My Commission Expires : 03/31/2011



CERTIFICATE OF SERVICE

I hereby certify that service of a true copy of the foregoing has been made as follows:

Type of Service: First Class U.S. Mail

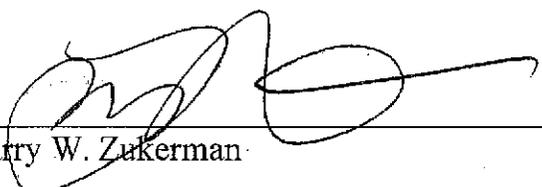
Date of Service:

Persons served and address: Carol Hamilton O'Brien, Esq.
30 East Broad Street, 14th Floor
Columbus Ohio 43215

Stephen Schumaker, Esq.
Clark County Prosecutor
PO Box 1608
Springfield OH 45501

David Rowland, Esq.
77 South High Street, Room 1702
Columbus Ohio 43215

Item Served: Verified Motion For Admission To Appear *Pro Hac Vice*



Larry W. Zukerman