

In the
Supreme Court of Ohio

DONALD KRIEGER, et al.,	:	Case No. 2008-1463
	:	
Plaintiffs-Appellees,	:	On Appeal from the
	:	Cuyahoga County
v.	:	Court of Appeals,
	:	Eighth Appellate District
CLEVELAND INDIANS BASEBALL	:	
CO., et al.,	:	Court of Appeals Case
	:	Nos. 89314
Defendant-Appellant.	:	89428
	:	89463

**MOTION TO ADMIT DAVID M. LIEBERMAN *PRO HAC VICE*
TO REPRESENT *AMICUS CURIAE* STATE OF OHIO**

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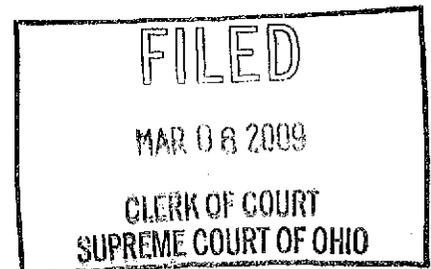
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TO REPRESENT *AMICUS CURIAE* STATE OF OHIO**

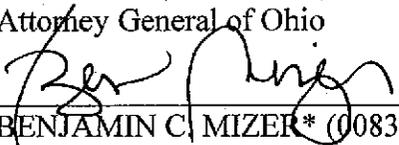
In accordance with Supreme Court Practice Rule I, Section 2, Benjamin C. Mizer (Ohio Bar No. 0083089) moves the Court to admit David M. Lieberman to appear on behalf of and
h represent *pro hac vice Amicus Curiae* State of Ohio in the above-captioned matter, stating the following grounds:

1. Mr. Lieberman is a Deputy Solicitor in Ohio Attorney General Richard Cordray's Office, located at 30 East Broad Street, 17th Floor, Columbus, Ohio 43215. He is the 2008-2009 Simon B. Karas Fellow.
2. Mr. Lieberman graduated from the Stanford Law School in 2006.
3. Mr. Lieberman is admitted to the bar of the Commonwealth of Virginia. He is also admitted to practice in the United States District Court for the Eastern District of Virginia and the United States Courts of Appeals for the Fourth, Sixth, and Ninth Circuits. He is a member in good standing of each of these bars.

WHEREFORE, Benjamin C. Mizer respectfully requests that this Court admit David M. Lieberman *pro hac vice* for the purpose of representing *Amicus Curiae* State of Ohio in the above-captioned matter.

Respectfully submitted,

RICHARD CORDRAY (0038034)
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion to Admit David M. Lieberman *Pro Hac Vice* to Represent *Amicus Curiae* State of Ohio was served by U.S. mail this 6th day of March, 2009, upon the following counsel:

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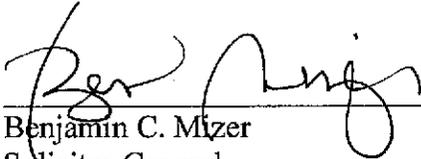
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Benjamin C. Mizer
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