

ORIGINAL

Case No. 2008-1499

In the Supreme Court of Ohio

APPEAL FROM THE COURT OF APPEALS
FIFTH APPELLATE DISTRICT
STARK COUNTY, OHIO
CASE NO. 2007CA0027

STATE OF OHIO,
Plaintiff-Appellant,

v.

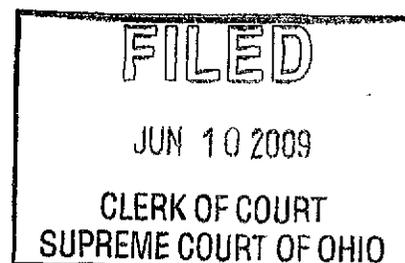
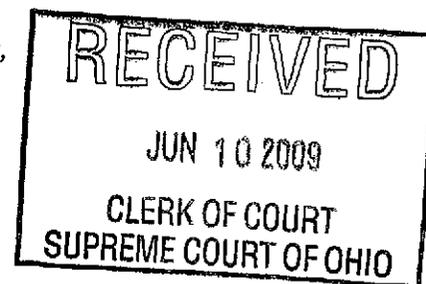
ANTHONY D. JACKSON,
Defendant-Appellee.

**MOTION TO ADMIT AARON NISENSEN *PRO HAC VICE* TO
REPRESENT *AMICUS CURIAE* INTERNATIONAL UNION OF POLICE
ASSOCIATIONS, AFL-CIO**

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MOTION TO ADMIT AARON NISENSEN *PRO HAC VICE* TO
REPRESENT *AMICUS CURIAE* INTERNATIONAL UNION OF POLICE
ASSOCIATIONS, AFL-CIO

In accordance with Supreme Court Practice Rule I, Section 2, John Rocca (Ohio Bar No. 0033520) moves the Court to admit Aaron Nisenson to appear on behalf of and represent *pro hac vice Amicus Curiae* International Union of Police Association, AFL-CIO, in the above-captioned matter, stating the following grounds:

1. Mr. Nisenson is the General Counsel of the International Union Police Associations, AFL-CIO, located at 1549 Ringling Blvd.-6th Floor, Sarasota, FL 34236.
2. Mr. Nisenson graduated from Boston College Law School in 1990.
3. Mr. Nisenson is admitted to practice in the highest court of the District of Columbia, the State of Maryland, the Commonwealth of Virginia, and the State of Florida. He is also admitted to practice in the United States Supreme Court, and the United States Courts of Appeals for the Federal, Fourth, Eighth, and Eleventh Circuits. He is a member in good standing of each of these bars.
4. Mr. Nisenson has authored *amicus curia* briefs submitted on behalf of the I.U.P.A., including a recent brief submitted to the Supreme Court of *Wisconsin v. Brockdorf*, 291 Wis.2d 635, 717 N.W.2d 657 (Wis. 2006) addressing the appropriate standard for determining whether a statement by a police officer was compelled under *Garrity*.

WHEREFORE, John Roca, respectfully requests that this Court admit Aaron Nisenson *pro hac vice* for the purpose of representing *Amicus Curiae* International Union of Police Associations in the above-captioned matter.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "John Roca".

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Certificate of Service

I certify a true and accurate copy of the foregoing has been forwarded to the following by regular U.S. Mail this 9th day of June, 2009 to:

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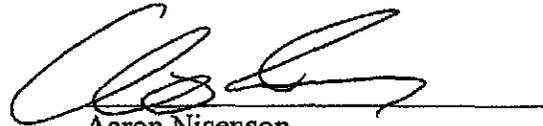
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A handwritten signature in black ink, appearing to read 'A. Nisenson', written over a horizontal line.

Aaron Nisenson
*Counsel for Amicus International
Union of Police Associations, AFL-
CIO*