
In the Supreme Court of Ohio

PENNSYLVANIA GENERAL INSURANCE COMPANY, etc.,

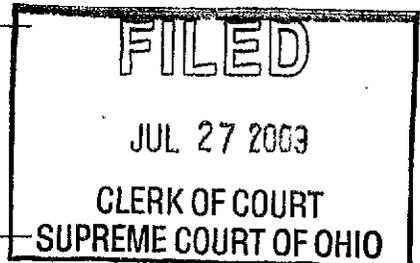
Plaintiff-Appellee,

v.

PARK-OHIO INDUSTRIES, INC., et al.,

Defendants-Appellants.

DISCRETIONARY APPEAL FROM THE
COURT OF APPEALS, EIGHTH APPELLATE DISTRICT
CUYAHOGA COUNTY, OHIO
CASE No CA-07-090619



**MOTION FOR ADMISSION PRO HAC VICE ON BEHALF
OF REBECCA L. ROSS, ESQ., KATHLEEN M. SULLIVAN, ESQ.
AND JANE M. BYRNE, ESQ.**

Pursuant to Rule I, Section 2 of the Supreme Court Rules of Practice, Timothy J. Fitzgerald, counsel of record for Defendant-Appellant Continental Casualty Company, hereby respectfully moves this Court for an order of admission pro hac vice of Rebecca L. Ross, Esq., Kathleen M. Sullivan, Esq. and Jane M. Byrne, Esq. to appear and serve as co-counsel for Defendant-Appellant Continental Casualty Company in the appeal proceedings before this Court.

Ms. Ross is a partner with the law firm of Troutman Sanders LLP, located at 55 West Monroe Street, Suite 3000, Chicago, IL 60603, (telephone: (312) 759-1921 and facsimile: (773) 877-3733 and e-mail address: becky.ross@troutmansanders.com) where she is the managing

partner of the firm's Chicago office and the Practice Group leader for the Insurance and Reinsurance Practice Group. Ms. Ross is admitted to the practice of law, and is in good standing, in the District of Columbia, State of Illinois, State of Minnesota (inactive status) and State of Nebraska (inactive status). She has also been admitted to practice before the Supreme Court of the United States, United States Court of Appeals - District of Columbia Circuit, United States District Court - District of Columbia, United States District Court - N.D. Illinois, and United States District Court - Maryland.

Ms. Sullivan, the former Dean of Stanford Law School, is a partner with the law firm of Quinn Emanuel Urquhart Oliver & Hedges, LLP, located at 51 Madison Avenue, 22nd Floor, New York, NY 10010, (telephone: (212) 849-7000 and facsimile: (212) 849-7100 and e-mail address: kathleensullivan@quinnemanuel.com) where she is the Chair of the firm's national Appellate Practice. Ms. Sullivan is admitted to the practice of law, and is in good standing, in the State of New York, the Commonwealth of Massachusetts, and State of California. She has also been admitted to practice before the Supreme Court of the United States; United States Courts of Appeals for the First, Second, Fifth, Ninth, Eleventh, and Federal Circuits; United States District Court - Northern District of California; United States District Court - Central District of California; United States District Court - District of Massachusetts; United States District Court - Southern District of New York; and United States District Court - Eastern District of New York.

Ms. Byrne is also a partner with the law firm of Quinn Emanuel Urquhart Oliver & Hedges, LLP, located at 51 Madison Avenue, 22nd Floor, New York, NY 10010, (telephone: (212) 849-7000 and facsimile: (212) 849-7100 and e-mail address: janebyrne@quinnemanuel.com) where her practice is devoted to reinsurance and insurance issues and litigation. Ms. Byrne is admitted to the practice of law, and is in good standing, in the State of New York. She has also

been admitted to practice before the United States District Court - Southern District of New York; and United States District Court - Eastern District of New York.

Ms. Ross, Ms. Sullivan and Ms. Byrne have not been subject to any disciplinary or grievance proceedings in any court or jurisdiction where they have been admitted to practice. If admitted pro hac vice in this matter, they agree to conduct themselves in accordance with the Ohio Rules of Professional Conduct adopted by the Supreme Court of Ohio in connection with their involvement and representation of Continental Casualty Company.

Counsel seeking this order, Mr. Fitzgerald, is an attorney admitted to practice in Ohio and is currently registered with the Attorney Registration Section for active status and is in good standing. Mr. Fitzgerald and the law firm of Gallagher Sharp will be associated as co-counsel with Ms. Ross, Ms. Sullivan and Ms. Byrne at all times in the representation and appeal of Defendant-Appellant Continental Casualty Company.

Accordingly, Continental Casualty Company and its undersigned attorney, respectfully move this Court for an order of admission pro hac vice for Ms. Ross, Ms. Sullivan and Ms. Byrne with respect to this appeal.

Date: July 24, 2009.

Respectfully submitted,



TIMOTHY J. FITZGERALD * (#0042734)

** Counsel of Record*

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PROOF OF SERVICE

A copy of the foregoing *Motion for Admission Pro Hac Vice On Behalf of Rebecca L. Ross, Esq., Kathleen M. Sullivan, Esq. and Jane M. Byrne, Esq.* was sent by regular U.S. mail, postage pre-paid, this 27th day of July, 2009 to the following:

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