

ORIGINAL

IN THE SUPREME COURT OF OHIO

Global Knowledge Training, LLC,	)	
	)	Case No. 09-1543
Appellant,	)	
	)	
vs.	)	Appeal from the Ohio
	)	Board of Tax Appeals
Richard A. Levin,	)	
Tax Commissioner of Ohio,	)	
	)	
Appellee.	)	BTA Case No. 2006-V-471

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MOTION FOR ADMISSION PRO HAC VICE OF WILLIAM I. SUSSMAN

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Nicholas M.J. Ray (0068664)  
 (Counsel of Record)  
 Siegel Siegel Johnson & Jennings Co. LPA  
 3001 Bethel Road  
 Suite 208  
 Columbus, OH 43220  
 (614) 442-8885

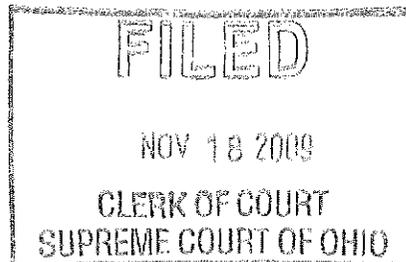
Richard Cordray (0038034)  
 Ohio Attorney General  
 Damion M. Clifford (0077777)  
 Assistant Attorney General  
 30 E. Broad Street, 25th Floor  
 Columbus, OH 43266-0410  
 (614) 466-5967

Counsel for Appellant  
 Global Knowledge Training, LLC

Counsel for Appellee  
 Tax Commissioner of Ohio

William I. Sussman\*  
 Michael P. Robotti\*  
 Ropes & Gray LLP  
 1211 Avenue of the Americas  
 New York, NY 10036-8704  
 212-596-9000  
 \*(Members, New York bar)

Of Counsel for Appellant  
 Global Knowledge Training, LLC



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Pursuant to Rules of Practice of the Ohio Supreme Court, Rule I, Section 2, Nicholas M. J. Ray (0068664), a member in good standing of the bar of this Court, who is registered in active status with the Clerk, hereby moves the Court for admission *pro hac vice* of William I. Sussman, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036-8704 as counsel for Appellant in this case.

1. Mr. Sussman's qualifications for admission *pro hac vice* include that he is a member in good standing of the bar of the State of New York. Mr. Sussman's qualifications are more fully set forth in his attached affidavit, which is incorporated herein by reference.

Respectfully submitted,



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Nicholas M.J. Ray (0068664), Counsel of Record  
Siegel, Siegel, Johnson & Jennings Co., LPA  
3001 Bethel Rd., Suite 208  
Columbus, Ohio 43220  
Tel: (614) 442-8885  
Fax: (614) 442-8880

Counsel for Appellant  
Global Knowledge Training, LLC

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**AFFIDAVIT OF WILLIAM I. SUSSMAN**

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(Counsel of Record)  
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Tax Commissioner of Ohio

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**AFFIDAVIT OF WILLIAM I. SUSSMAN**

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STATE OF NEW YORK    )  
                                  )  
COUNTY OF NEW YORK )

1.     My name is William I. Sussman.
  
2.     I am a Partner in the law firm of Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036-8704.
  
3.     I am a member in good standing of the bar of the State of New York, and I am a member in good standing of the bars of the following federal courts: United States Supreme Court; United States Courts of Appeals for the Second, Sixth, Seventh, and Ninth Circuits; and United States District Courts for the Eastern, Northern, and Southern Districts of New York, the Northern District of California, the Eastern District of Michigan, and the Western District of Texas. I am not currently under investigation, or the subject of disciplinary proceedings by any disciplinary board, commission, or office of any state or federal court or bar association.

4. The Appellant, Global Knowledge Training, LLC, has requested that I represent the Appellant before the Supreme Court of Ohio in this matter. Ropes & Gray has a long-standing attorney-client relationship with Appellant and has represented Appellant in various matters in the past.

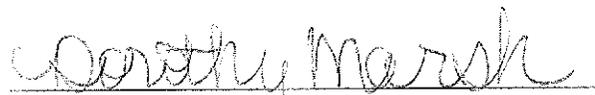
5. I am competent to handle the matters involved in this case.

FURTHER AFFIANT SAYETH NAUGHT

Dated this 12 day of November 2009.

  
WILLIAM I. SUSSMAN

THE FOREGOING INSTRUMENT was sworn to and subscribed before me this 12 day of November, 2009, by WILLIAM I. SUSSMAN, who said upon oath that he has read the foregoing instrument and that it is true and correct to best of his knowledge, and who is personally known to me.

  
Notary Public

Dorothy Marsh  
Print Name of Notary

**DOROTHY MARSH**  
Notary Public, State of New York  
No. 01MA4951537  
Qualified in Westchester County  
Commission Expires May 22, 2011

**CERTIFICATE OF SERVICE**

This is to certify that on this 17<sup>th</sup> day of November 2009, a copy of the Motion for

Admission Pro Hac Vice of William I. Sussman was sent via Federal Express to:

Richard Cordray,  
Attorney General of Ohio  
Damion M. Clifford  
Assistant Attorney General  
30 East Broad Street, 25<sup>th</sup> Floor  
Columbus, OH 43266-0410



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