

ORIGINAL

IN THE SUPREME COURT OF OHIO

State <i>ex rel.</i> Data Trace Information	:	Case No. 2010-2029
Services, LLC, <i>et al.</i> ,	:	
	:	
Relators,	:	Original Action in Mandamus
	:	
v.	:	
	:	
Recorder of Cuyahoga County, Ohio,	:	
	:	
Respondent.	:	

MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE*

Pursuant to Gov. Bar R. XII(2)(A)(6), Lucy A. Dalglish, counsel of record for The Reporters Committee for Freedom of the Press (“Movant”), hereby moves this Honorable Court for permission to appear *pro hac vice* and participate as counsel of record in the above-captioned matter for *amicus curiae* The Reporters Committee for Freedom of the Press. As set forth in greater details in the brief *amicus curiae* conditionally filed herewith, The Reporters Committee for Freedom of the Press advocates on behalf of working journalists to protect their First Amendment and freedom of information interests. This case is of particular concern as it raises the possibility of the public being effectively priced out of electronic access to records held in trust for the public by the Recorder of Cuyahoga County. Movant respectfully requests that this Court grant this Motion.

Movant states that her 2011 application for *pro hac vice* registration has been previously granted and that she has been assigned Registration No.: PHV-1474-2011. A true and correct copy of Movant’s 2011 Certificate of *Pro Hac Vice* Registration is appended to this Motion.

RECEIVED
 JUN 14 2011
 CLERK OF COURT
 SUPREME COURT OF OHIO

FILED
 JUN 14 2011
 CLERK OF COURT
 SUPREME COURT OF OHIO

CONTACT INFORMATION

Movant states that her current residential address is 1100 Flor Lane, McLean, VA 22102 and that she is employed as the Executive Director of The Reporters Committee for Freedom of the Press, a non-profit organization with offices located at 1101 Wilson Blvd., Ste. 1100, Arlington, VA 22209.

JURISDICTIONS ADMITTED TO PRACTICE

Movant states that the following is a list of jurisdictions in which she has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

- U.S. Supreme Court: admitted 5/2/99
- U.S. Courts of Appeals:
 - First Circuit: admitted 5/23/02 (bar no. 83760)
 - Third Circuit: admitted 11/25/05
 - Fourth Circuit: admitted 1/7/03
 - Fifth Circuit: admitted 5/11/09
 - Sixth Circuit: admitted 8/24/00
 - Seventh Circuit: admitted 4/16/04
 - Ninth Circuit: admitted 3/31/00
 - Eleventh Circuit, admitted 4/26/11
 - District of Columbia: admitted 3/29/01 (bar no. 47434)
- U.S. District Courts:
 - District of Columbia: admitted 9/11/06 (bar no. 471176)
 - Minnesota: admitted 12/22/95 (bar no. 257400) (inactive)
- District of Columbia Court of Appeals: admitted 5/11/01 (bar no. 471176)
- Minnesota Supreme Court: admitted 10/27/95 (bar no. 257400)

GOV. BAR R. XII(2)(A)(6)(c) COMPLIANCE

An affidavit of compliance is appended to this Motion.

GOV. BAR R. XII(2)(A)(5) COMPLIANCE

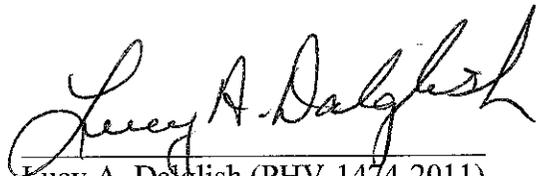
Movant states that she has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year.

ASSOCIATION WITH IN-STATE ATTORNEY

Monica L. Dias (0073617), an active Ohio attorney in good standing, has agreed to associate with Movant in this matter.

Dated: June 13, 2011

Respectfully submitted,
Lucy A. Dalglish



Lucy A. Dalglish (PHV-1474-2011)
1101 Wilson Blvd., Ste. 1100
Arlington, VA 22209
Tele: (703) 807-2100
Fax: (703) 807-2109
ldalglish@rcfp.org

COUNSEL FOR *AMICUS CURIAE*,
THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Lucy Dalglish

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2011

Registration Number:

PHV- 1474-2011

Lucy Dalglish

_____, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

IN THE SUPREME COURT OF OHIO

IN THE MATTER OF THE MOTION OF

CASE NO. 2010-2029

Lucy Dalglish (PHV-1474-2011)

FOR PERMISSION TO APPEAR PRO HAC VICE

**AFFIDAVIT OF
OUT-OF-STATE ATTORNEY**
Gov. Bar R. XII, Section 2(A)(6)

State of Commonwealth of Virginia)

County of Arlington)

ss:

Lucy Dalglish (PHV-1474-2011), being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdiction(s):

U.S. Supreme Court; U.S. Courts of Appeal: 1st Cir., 3d Cir., 4th Cir., 5th Cir., 6th Cir., 7th Cir., 8th Cir., 9th Cir., 11th Cir., DC Cir.; U.S. Dist. Ct.: DC, D.Minn.; DC Court of Appeals; Minnesota Supreme Court

c. Choose one:

I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.

I am currently suspended from the practice of law in the following jurisdiction(s):

d. Choose one:

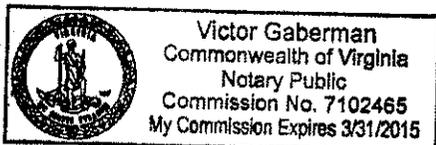
I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.

I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

Lucy A. Dalglish
SIGNATURE OF OUT-OF-STATE ATTORNEY

Sworn to or affirmed before me and subscribed in my presence the 13th

day of June, 2011



Victor Gaberman
NOTARY PUBLIC

CERTIFICATE OF SERVICE

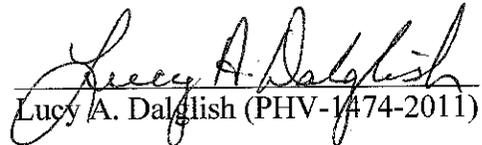
I certify that on this 13th day of June, 2011 the foregoing Motion for Permission to Appear *Pro Hac Vice* was sent via ordinary U.S. mail, in sealed wrappers, postage prepaid, by depositing true and correct copies thereof in a secure receptacle under the exclusive custody and control of the U.S. Postal Service to the following counsels of record:

David Marburger
Baker & Hostetler LLP
1900 East Ninth St.
PNC Center, Ste. 3200
Cleveland, OH 44114-3485

COUNSEL FOR RELATORS

David T. Movius
McDonald Hopkins LLC
600 Superior Ave., East
Ste. 2100
Cleveland, OH 44114

COUNSEL FOR RESPONDENT


Lucy A. Dalglish (PHV-1474-2011)

COUNSEL FOR *AMICUS CURIAE*,
THE REPORTERS COMMITTEE FOR
FREEDOM OF THE PRESS