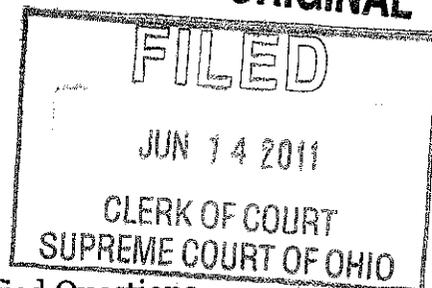


ORIGINAL



IN THE SUPREME COURT OF OHIO

Sondra Anderson,	:	Supreme Court
	:	Case No. 11-0908
Plaintiff-Respondent,	:	
	:	On Review of Certified Questions
v.	:	From the United States District Court
	:	Northern District of Ohio,
Barclays Capital Real Estate Inc.	:	Western Division
d/b/a HomEq Servicing,	:	
	:	Case No. 3:09-cv-02335-JGC
Defendant-Petitioner.	:	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov.Bar R. XII(2)(A)(6), Benjamin B. Klubes, attorney for Barclays Capital Real Estate Inc. d/b/a HomEq Servicing hereby moves the Supreme Court of Ohio to grant him permission to appear pro hac vice and participate as counsel or co-counsel in this case for Barclays Capital Real Estate Inc. d/b/a HomEq Servicing.

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

- District of Columbia, Bar No. 428852, admitted June 17, 1991; and
- Maryland, Bar No. N/A, admitted December 19, 1990.

Movant represents that he has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov.Bar R. XII(2)(A)(5).

James D. Curphey, Registration No. 0015832, an active Ohio attorney in good standing, has agreed to associate with Movant on this case.

The affidavit required by Gov.Bar R. XII(2)(A)(6), a copy of Movant's certificate of pro hac vice registration furnished by the Supreme Court of Ohio Office of Attorney

Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if this Motion is granted, Movant must file a Notice of Permission to Appear Pro hac Vice and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Benjamin B. Klubes
(Name of Movant/PHV Attorney)

PHV – 1659 - 2011
(PHV Registration Number)

BUCKLEY SANDLER LLP
(Law Firm or Employer, if applicable)

1250 24th Street N.W., Suite 700
(Business Address)

Washington, D.C. 20037
(City, State or Country, ZIP Code)

(202) 349-8002
(Business Telephone)

(202) 349-8080
(Business Fax)

bklubes@buckleysandler.com
(Business Email)

7200 Armat Drive
Bethesda, MD 20817
(Residential Address)

CERTIFICATE OF SERVICE

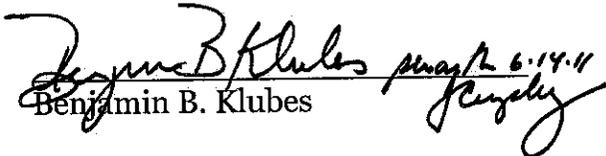
I hereby certify that a copy of the foregoing Motion for Permission to Appear Pro Hac Vice was sent by first class mail, postage prepaid, this 14th day of June, 2011 to the following:

John T. Murray (0008793)
(COUNSEL OF RECORD)
Leslie O. Murray (0081496)
Michael J. Stewart (0082257)
MURRAY & MURRAY CO. LPA
111 E. Shoreline Drive
Sandusky, OH 44870

COUNSEL FOR RESPONDENT
SONDRA ANDERSON

R. Michael DeWine (0009181)
OHIO ATTORNEY GENERAL
Susan A. Choe (0067032)
(COUNSEL OF RECORD)
Jeffrey R. Loeser (0082144)
OFFICE OF THE OHIO ATTORNEY GENERAL
CONSUMER PROTECTION SECTION
14th Floor, 30 East Broad Street
Columbus, OH 43215

COUNSEL FOR AMICI CURIAE
STATE OF OHIO AND MICHAEL
DEWINE, OHIO ATTORNEY GENERAL


Benjamin B. Klubes

IN THE SUPREME COURT OF OHIO

IN THE MATTER OF THE MOTION OF

CASE NO. 11-0908

Benjamin B. Klubes

FOR PERMISSION TO APPEAR PRO HAC VICE

State of District of Columbia)

County of _____)

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

ss:

Benjamin B. Klubes, 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):

Maryland; District of Columbia

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):

Benjamin B. Klubes
SIGNATURE OF OUT-OF-STATE ATTORNEY

13th

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

day of June, 2011

Charlene C. John
Notary Public, District of Columbia
My Commission Expires 4/14/2015

Charlene C. John
NOTARY PUBLIC

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Benjamin Klubes

FOR PRO HAC VICE REGISTRATION

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

Certificate of
PRO HAC VICE
REGISTRATION

2011

Registration Number:
PHV- 1659-2011

Benjamin Klubes

_____, 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