

**IN THE SUPREME COURT OF OHIO**

STATE, ex rel. ESPN, INC.,	:	
	:	
Petitioner,	:	Case No. 2011-1177
	:	
vs.	:	Original Action in Mandamus
	:	
THE OHIO STATE UNIVERSITY,	:	
	:	
Respondent.	:	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov.Bar R. XII(2)(A)(6), Ada Meloy, General Counsel of Amicus Curiae American Council on Education, hereby moves the Supreme Court of Ohio to grant her permission to appear pro hac vice and participate as counsel or co-counsel in this case for Amici Curiae American Council on Education, American Association of Collegiate Registrars and Admission Officers, American Association of Community Colleges, Association of American Universities, Association of Public and Land-Grant Universities, and NASPA-Student Affairs Administrators in Higher Education.

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

- New York (1356476, 1974)
- District of Columbia (227835, 1976)

<p><b>FILED</b></p> <p>NOV 30 2011</p> <p>CLERK OF COURT SUPREME COURT OF OHIO</p>
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Movant represents that Ada Meloy 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).

John J. Kulewicz (0008376), 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.

Ada Meloy  
(Name of Movant/PHV Attorney)

PHV-2085-2011  
(PHV Registration Number)

American Council on Education  
(Law Firm or Employer)

One Dupont Circle  
(Business Address)

Washington, DC 20036  
(City, State, Zip Code)

(202) 939-9361  
(Business Telephone)

(202) 833-4762  
(Business Fax)

ameloy@acenet.edu  
(Business E-Mail)

2561 Waterside Dr., NW

Washington, DC 20008  
(Residential Address)

## CERTIFICATE OF SERVICE

I served a copy of the foregoing Motion for Permission to Appear Pro Hac Vice upon the counsel listed below by first-class U.S. mail on November 30, 2011:

John C. Greiner (0005551)  
*\*Counsel of Record*  
GRAYDON HEAD & RITCHEY LLP  
1900 Fifth Third Center  
511 Walnut Street  
Cincinnati, Ohio 45202-3157  
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*Counsel for Petitioner*  
*ESPN, Inc.*

Michael DeWine (0009181)  
OHIO ATTORNEY GENERAL  
Alexandra T. Schimmer (0075732)  
Solicitor General  
*\*Counsel of Record*  
Damian W. Sikora (0075224)  
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30 East Broad Street, 17<sup>th</sup> Floor  
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Alexandra.schimmer@ohioattorneygeneral.gov

*Counsel for Respondent*  
*The Ohio State University*

Alisa B. Klein  
Attorney, Appellate Staff  
Civil Division, Room 7235  
Department of Justice  
950 Pennsylvania Ave., N.W.  
Washington, D.C. 20530-0001

*Counsel for Amicus Curiae*  
*The United States of America*



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Ada Meloy

IN THE MATTER OF THE MOTION OF

CASE NO. 2011-1177

Ada Meloy

FOR PERMISSION TO APPEAR PRO HAC VICE

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

State of District of Columbia )  
City of Washington )  
County of \_\_\_\_\_ )

SS:

Ada Meloy, 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):  
New York, District of Columbia and various federal courts

c. Choose one:

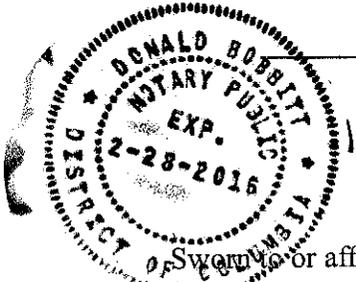
I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.

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):  
\_\_\_\_\_



Ada Meloy  
SIGNATURE OF OUT-OF-STATE ATTORNEY

Subscribed and sworn to before me and subscribed in my presence the  
day of November 17, 2011

Donald Bobbitt  
Notary Public, D.C.  
My commission expires 2/28/2016

NOTARY PUBLIC

# THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Ada Meloy**

FOR PRO HAC VICE REGISTRATION

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

**Ada Meloy**

Certificate of  
PRO HAC VICE  
REGISTRATION

2011

Registration Number:  
PHV- 2194-2011

\_\_\_\_\_, 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**