

Case No. 2012-0613

In the
Supreme Court of Ohio

JOHN FRESHWATER,

Appellant,

v.

**MOUNT VERNON CITY SCHOOL DISTRICT
BOARD OF EDUCATION,**

Appellee

Appeal from the Court of Appeals of Knox County, Ohio, Fifth Appellate District

MOTION FOR ADMISSION *PRO HAC VICE*

WILLIAM J. BURGESS
Appignani Humanist Legal Center
American Humanist Association
1777 T Street, N.W.
Washington, D.C. 20009
(202) 238-9088
bburgess@americanhumanist.org

RECEIVED
OCT 04 2012
CLERK OF COURT
SUPREME COURT OF OHIO

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OCT 04 2012
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SUPREME COURT OF OHIO

Ohio Supreme Court

John Freshwater

v.

Mount Vernon City School District Board

2012-0613

Case No. _____

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov.Bar R. XII(2)(A)(6), William Burgess, attorney for American Humanist Assoc, 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 amicus curiae the American Humanist Association in support of appellee

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

Virginia (2000, #45234), District of Columbia (2001, #473101), and Florida (2002, #563471)

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).

Keith Nowak (#0084581) _____, 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.

William Burgess

(Name of Movant/PHV Attorney)

3190-2012

PHV -

(PHV Registration Number)

American Humanist Association

(Law Firm or Employer, if applicable)

1777 T St., N.W.

(Business Address)

Washington, DC 20009

(City, State or Country, ZIP Code)

202-238-9088

(Business Telephone)

202-238-9003

(Business Fax)

bburgess@americanhumanist.org

(Business E-Mail)

209 S. Courthouse Rd.

Arlington, VA 22204

(Residential Address)

William Burgess

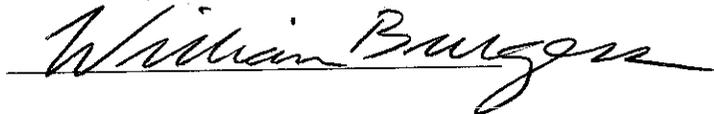
CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2012, the foregoing motion for admission *pro hac vice* was mailed by first-class mail, postage prepaid, to:

David K. Smith
Krista K. Keim
Paul J. Deegan
Britton, Smith Peters & Kalail Co., L.P.A.
3 Summit Park Drive, Suite 400
Cleveland, OH 44131

R. Kelly Hamilton
The Law Office of R. Kelly Hamilton, LLC
P.O. Box 824
Grove City, OH 43123

Rita M. Dunaway
The Rutherford Institute
P.O. Box 7482
Charlottesville, VA 22906

A handwritten signature in cursive script, reading "William Burgess", written over a horizontal line.

William Burgess
American Humanist Association

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

William Burgess

FOR PRO HAC VICE REGISTRATION

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

Certificate of
PRO HAC VICE
REGISTRATION

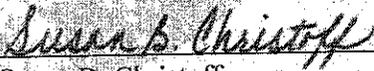
2012

Registration Number:
PHV- 3190-2012

William Burgess

, 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, 2012

William Burgess

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

FOR PERMISSION TO APPEAR PRO HAC VICE

William Burgess 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 jurisdictions (attach additional jurisdictions if necessary):

Virginia

Florida

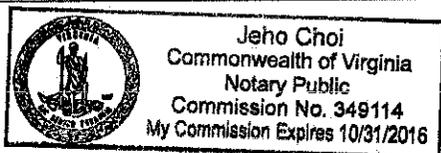
District of Columbia

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 jurisdictions:

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):



William Burgess
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 3 day of OCT.,
2012, in the state of Virginia and county of Arlington.

Jeho Choi
SIGNATURE OF NOTARY PUBLIC*

*Affix stamp & seal (required in Ohio).