

ORIGINAL

IN THE SUPREME COURT OF THE STATE OF OHIO

STATE OF OHIO ex rel. JACK MORRISON, JR., LAW DIRECTOR, CITY OF MUNROE FALLS, OHIO, et al.

Plaintiffs-Appellants,

v.

BECK ENERGY COMPANY, et al.

Defendants-Appellees

Case No. 2013-0465

Appeal from the Summit County Court of Appeals, Ninth Appellate District, Case No. 25953

FILED SEP 09 2013 CLERK OF COURT SUPREME COURT OF OHIO

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar. R. XII(2)(A)(6), Deborah Goldberg (PHV-4255-2013) ("Movant"), attorney with Earthjustice, hereby moves the Supreme Court of the State of Ohio to grant her permission to appear pro hac vice and participate as co-counsel in this case representing amici curiae health professionals in support of Appellant.

Movant represents that the following is a list of the 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, see Gov. Bar. R. XII(2)(A)(6)(b):

- State of New York (2108959), 1987 – present
• United States Supreme Court, 1991 – present
• U.S. Court of Appeals for the First Circuit (6408), 1987 – present
• U.S. Court of Appeals for the Second Circuit (91-138), 1991 – present
• U.S. Court of Appeals for the Fourth Circuit, 2007 – present
• U.S. Court of Appeals for the Eighth Circuit, 1998 – present
• U.S. Court of Appeals for the Ninth Circuit, 2005 – present
• U.S. Court of Appeals for the D.C. Circuit, 2009 – present
• U.S. Court of Appeals for the Eleventh Circuit, 2003-2008
• U.S. District Court for the Southern District of New York (DG9285), 1988 – present
• U.S. District Court for the Eastern District of New York (DG9285), 1989 – present
• U.S. District Court for the Western District of New York, 1989 – present
• U.S. District Court for the Northern District of New York, 1989-2011

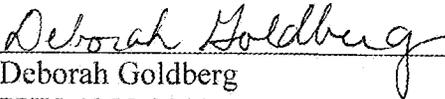
Movant has discontinued her admissions in the U.S. Court of Appeals for the Eleventh Circuit and in the U.S. District Court for the Northern District of New York because she has not practiced law in those jurisdictions in recent years.

Movant represents 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 pursuant to Gov. Bar. R. XII(2)(A)(5).

Richard C. Sahli (0007360), an active Ohio attorney in good standing, agrees to associate with Movant as co-counsel on this case. Mr. Sahli's office address is 981 Pinewood Lane, Columbus, Ohio 43230, and his office phone number is 614-428-6068.

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.

Dated: September 6, 2013


Deborah Goldberg
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IN THE MATTER OF THE MOTION OF

CASE NO. 2013-0465

Deborah Goldberg

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

FOR PERMISSION TO APPEAR PRO HAC VICE

Deborah Goldberg 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):

New York

See additional page

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):

Deborah Goldberg
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 4 day of September,

20 13, in the state of New York and county of New York.

BRIDGET M. LEE
Notary Public, State of New York
No. 02LE6215997

Qualified in New York County
*Affix stamp & seal (required in Ohio).
Commission Expires 1/11/2014

Bridget M. Lee
SIGNATURE OF NOTARY PUBLIC*

Additional Bar Admissions of Deborah Goldberg

- United States Supreme Court, 1991 – present
- U.S. Court of Appeals for the First Circuit (6408), 1987 – present
- U.S. Court of Appeals for the Second Circuit (91-138), 1991 – present
- U.S. Court of Appeals for the Fourth Circuit, 2007 – present
- U.S. Court of Appeals for the Eighth Circuit, 1998 – present
- U.S. Court of Appeals for the Ninth Circuit, 2005 – present
- U.S. Court of Appeals for the D.C. Circuit, 2009 – present
- U.S. Court of Appeals for the Eleventh Circuit, 2003-2008*
- U.S. District Court for the Southern District of New York (DG9285), 1988 – present
- U.S. District Court for the Eastern District of New York (DG9285), 1989 – present
- U.S. District Court for the Western District of New York, 1989 – present
- U.S. District Court for the Northern District of New York, 1989-2011*

* Ms. Goldberg has discontinued her admissions in the U.S. Court of Appeals for the Eleventh Circuit and in the U.S. District Court for the Northern District of New York because she has not practiced in those jurisdictions in recent years.

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Deborah Goldberg

FOR PRO HAC VICE REGISTRATION

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

Certificate of
PRO HAC VICE
REGISTRATION

2013

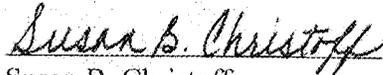
Registration Number:

PHV- 4255-2013

Deborah Goldberg

, 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, 2013

Certificate of Service

I hereby certify that I served the foregoing Motion for Permission to Appear Pro Hac Vice, with the accompanying Affidavit of Out-of-State Attorney and Certificate of Pro Hac Vice Registration, via e-mail, upon the following parties and attorneys of record at the e-mail addresses indicated below:

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Counsel for Plaintiffs-Appellants

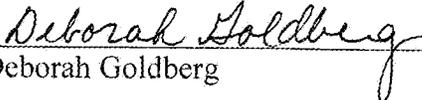
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Counsel for Amicus Curiae People's Oil and Gas Collaborative – Ohio

Dated: September 6, 2013


Deborah Goldberg