

## IN THE SUPREME COURT OF OHIO

THE STATE OF OHIO ex rel. JACK MORRISON, )  
 JR., LAW DIRECTOR, CITY OF MUNROE )  
 FALLS, OHIO, )

Case No. 2013-0465

Plaintiff-Appellant )

ON APPEAL FROM THE SUMMIT )  
 COUNTY COURT OF APPEALS, )  
 NINTH APPELLATE DISTRICT, )  
 CASE NO. 25953 )

v. )

BECK ENERGY CORP., et al. )

Defendant-Appellees )

## MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar. R. XII(2)(A)(6), Meleah Geertsma, PHV4257-2013, respectfully moves the Supreme Court of Ohio to grant her permission to appear pro hac vice and participate as co-counsel in this case representing Municipal Amici Curiae<sup>1</sup> in the above referenced case, Docket Number 2013-0465.

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:

- Bar of the District of Columbia, 489540, 11/12/2004-present
- State Bar of Illinois, 6298389, 5/07/2009-present
- United States Court of Appeals for the District of Columbia Circuit, 1/18/2011-present
- United States Court of Appeals for the Tenth Circuit, 3/28/2011-present

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.

<sup>1</sup> Municipal Amici Curiae are the Cities of Broadview Heights, Euclid, Mansfield, and North Royalton, and the Village of Amesville.

Bar. R. XII(2)(A)(5). As required by Gov. Bar. R. XII(2)(A)(6)(a), Movant has supplied her office address and the name and address of her employer below, and her residential address is 5027 N. Hermitage Ave, Apt 3N, Chicago, Illinois, 60640.

Peter Precario (0028080), an active Ohio attorney in good standing, agrees to associate with Movant Meleah Geertsma on this case. Mr. Precario is counsel in this matter, representing the Municipal Amici Curiae. Mr. Precario's office address is 2 Miranova Place, Suite 500, Columbus, Ohio, 43215, and his office phone number is 614-233-4813.

A copy of 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, she 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.

Respectfully submitted,

Dated: 9/5/2013



Meleah A. Geertsma  
Natural Resources Defense Council  
20 N. Wacker Dr., Ste 1600  
Chicago, IL 60606  
312-651-7904 (direct)  
312-234-9633 (fax)  
mgeertsma@nrdc.org

**Certificate of Service**

I hereby certify that I sent by first class United States mail on September 6, 2013 a copy of this motion for permission to appear pro hac vice to the below attorneys of record.

Dated: \_\_\_\_\_

9/6/13



\_\_\_\_\_  
Peter Precario (0027080)

Jack Morrison, Jr. (0014939)  
Thomas M. Saxer (0055962)  
Thomas R. Houlihan\* (0070067)  
    *\*Counsel of Record*  
AMER CUNNINGHAM CO., L.P.A.  
159 S. Main Street, Suite 1100  
Akron, Ohio 44308-1322  
Telephone: (330) 762-2411  
Facsimile: (330) 762-9918  
[Houlihan@DAmer-law.com](mailto:Houlihan@DAmer-law.com)  
*Counsel for Plaintiffs-Appellants*  
*Munroe Falls*

Barbara A. Tavaglione (0063617)  
9191 Paulding Street NW  
Massillon, Ohio 44646  
Telephone: (330) 854-0052  
[bartavaglione@gmail.com](mailto:bartavaglione@gmail.com)  
*Counsel for Amicus Curiae People's*  
*Oil and Gas Collaborative - Ohio*

John K. Keller\* (0019957)  
    *\*Counsel of Record*  
VORYS, SATER, SEYMOUR AND PEASE LLP  
52 East Gay Street  
P.O. Box 1008  
Columbus, Ohio 43216-1008  
Telephone: (614) 464-6400  
Facsimile: (614) 464-6350  
[jkkeller@vorys.com](mailto:jkkeller@vorys.com)  
*Counsel for Defendants-Appellees*  
*Beck Energy Corporation and Joseph*  
*Willingham*

IN THE MATTER OF THE MOTION OF

CASE NO. 2013-0465

Meleah A. Geertsma

FOR PERMISSION TO APPEAR PRO HAC VICE

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

Meleah A. Geertsma 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):

District of Columbia

State of Illinois

D.C. Circuit Court of Appeals (fed)

Tenth Circuit Court of Appeals (fed)

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:

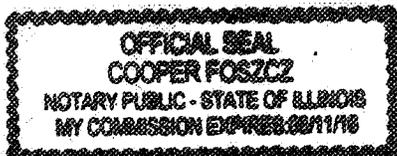
d. Choose one:

- 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):

Meleah A. Geertsma  
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 Illinois and county of Cook.



Cooper Foszcz  
SIGNATURE OF NOTARY PUBLIC\*

\*Affix stamp & seal (required in Ohio).

# THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Meleah Geertsma**

---

FOR PRO HAC VICE REGISTRATION

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

Certificate of  
PRO HAC VICE  
REGISTRATION

2013

Registration Number:

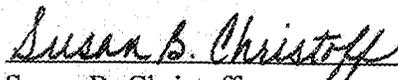
PHV- 4257-2013

**Meleah Geertsma**

---

\_\_\_\_\_ 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**