

ORIGINAL

IN THE SUPREME COURT OF OHIO

FRED SANBORN, <i>et al.</i>	:	Case No. 2013-1598
	:	
Appellants,	:	Appeal from the Ohio Board of Tax Appeals
	:	
v.	:	
	:	
INDIAN HILL BOARD OF EDUCATION, <i>et al</i>	:	Appeal from BTA Case No. 2010-K-938
	:	
Appellees,	:	

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

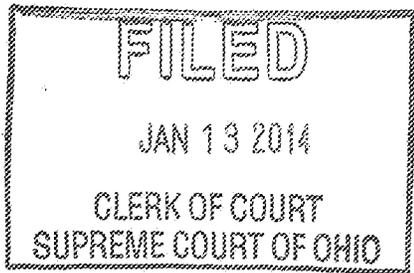
Pursuant to Gov.Bar.R. XII(2)(A)(6), Kelsey Hackem (Movant), attorney for Appellants Fred Sanborn, Richard Cocks, and Ruth Hubbard, hereby moves the Supreme Court of Ohio to grant her permission to appear *pro hac vice* and participate as co-counsel for Appellants in the above-captioned matter.

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: Michigan, Member Number P77574, admitted on November 1, 2013.

Movant further 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). Maurice A. Thompson (0078548), an active Ohio attorney in good standing, has agreed to associate with Movant on this case.

Attached to this Motion are 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: January 13, 2014



Respectfully submitted,



Kelsey E. Hackem
PHV-4719-2014

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Columbus, Ohio 43215
Tel: (614) 340-9817
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KHackem@OhioConstitution.org

Residential Address:
805 Bobcat Ave., Ste 313
Grandview Heights, OH 43212

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Permission to Appear *Pro Hac Vice* was served on this 13 day of January, 2014 via first class mail upon all parties listed below:

Joseph T. Deters
Hamilton County Prosecuting Attorney
Thomas J. Scheve
Assistant Prosecuting Attorney
230 East Ninth Street, Suite 4000
Cincinnati, Ohio 45202-1251

Harry J. Finke IV
Graydon Head & Ritchey LLP
1900 Fifth Third Center
511 Walnut Street
Cincinnati, Ohio 45202-3157

Michael DeWine (0009181)
Ohio Attorney General
30 E. Broad St., 17th Floor
Columbus, Ohio 43215
(614)466-4320
*Counsel for Appellee Joseph W. Testa, Tax Commissioner
of Ohio*


Kelsey E. Hackem

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Kelsey Hackem

FOR PRO HAC VICE REGISTRATION

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

Kelsey Hackem

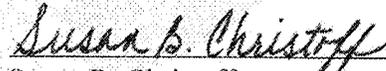
Certificate of
PRO HAC VICE
REGISTRATION

2014

Registration Number:
PHV- 4719-2014

_____, 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, 2014

IN THE MATTER OF THE MOTION OF

CASE NO. 2013-1598

Kelsey Hackem

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

FOR PERMISSION TO APPEAR PRO HAC VICE

Kelsey Hackem 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):

Michigan

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):

Kelsey Hackem
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 15th day of January, in the state of Ohio and county of Franklin.



MAURICE THOMPSON
Notary Public, State of Ohio
My Commission Has No Expiration

M. Thompson
SIGNATURE OF NOTARY PUBLIC*