

ORIGINAL

THE SUPREME COURT OF OHIO

State ex rel. Ohio Civil Service  
Employees Association et al.

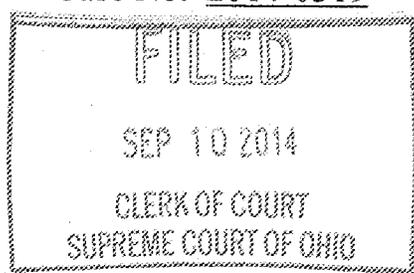
Appellees/Cross-Appellants,

v.

State of Ohio, et al.

Appellants/Cross-Appellees.

Case No. 2014-0319



**MOTION FOR PERMISSION TO APPEAR PRO HAC VICE**

Pursuant to Gov.Bar R. XII(2)(A)(6), Nicholas A. Serrano, attorney for the American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME” or the “International Union”), hereby moves the Supreme Court of Ohio to grant him permission to appear pro hac vice in order to file an *amicus curiae* brief for the International Union.

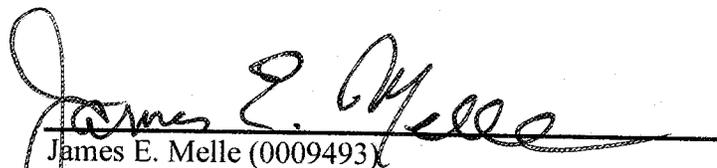
Movant represents that the following is a list of the jurisdictions in which Nicholas A. Serrano has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

Virginia: Licensed to practice law in Virginia as of October 14, 2011; Virginia State Bar ID No. 82619

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).

James E. Melle (0009493), an active Ohio attorney in good standing, has agreed to associate with Movant so that Movant can file an *amicus curiae* brief for the International Union.

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.



James E. Melle (0009493)  
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Nicholas A. Serrano  
PHV Registration Number - 5420-2014

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3003 Van Ness Street, N.W. Apt. # S-217  
Washington, DC 20008

## CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing Motion for Permission to Appear Pro Hac Vice, Affidavit of Out-of-State Attorney, and Certificate of Pro Hac Vice Registration was served on the following persons by United States mail on September 10, 2014:

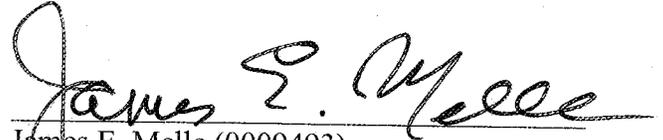
ERIC MURPHY  
30 East Broad St, 17th Floor  
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*Attorneys for State Defendants-  
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CHARLES R. SAXBE  
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*Attorneys for Cross-Appellees: Corrections  
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NICHOLAS A. IAROCCI  
Ashtabula County Prosecuting Attorney  
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*Attorney for Appellees: Dawn M. Cragon,  
Roger A. Corlett and Judith A. Barta*

ADAM W. MARTIN  
KEVIN W. KITNA  
Sutter O'Connell  
3600 Erieview Tower  
1301 East 9th Street

Cleveland, OH 44114  
*Attorneys for Defendant-Appellant/Cross-  
Appellee Management & Training Corporation*

A handwritten signature in black ink that reads "James E. Melle". The signature is written in a cursive style with a large initial "J" and "M".

James E. Melle (0009493)  
167 Rustic Place  
Columbus, Ohio 43214-2030  
(614) 271-6180; (419) 332-1488 fax  
[Jimmelle43@msn.com](mailto:Jimmelle43@msn.com)

Attorney for Plaintiffs-Appellees/Cross-  
Appellants: Ohio Civil Service Employees  
Association, David Combs, Clair Crawford,  
Lori Leach Douce, Margo Hall, Sheila  
Herron, Daniel Karcher, Rebecca Sayers,  
Angela Schuster, Troy Tackett, Kathy  
Tinker, Lisa Zimmerman and  
[ProgressOhio.org](http://ProgressOhio.org)

IN THE MATTER OF THE MOTION OF

CASE NO. 2014-0319

Nicholas A. Serrano

FOR PERMISSION TO APPEAR PRO HAC VICE

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

Nicholas A. Serrano 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

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:

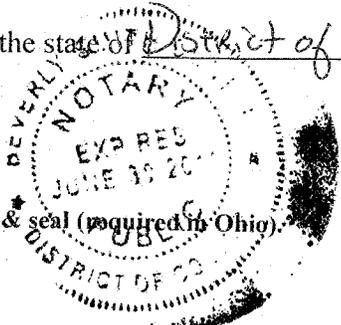
d. Choose one:

- 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):

*Nicholas A. Serrano*

SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 5 day of September, 20 14, in the state of District of Columbia and county of \_\_\_\_\_



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

*Beverly Smith Conjee*

BEVERLY SMITH CONJEE  
Notary Public of District of Columbia  
My Commission Expires June 30, 2019

# THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Nicholas Serrano**

FOR PRO HAC VICE REGISTRATION

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

Certificate of  
PRO HAC VICE  
REGISTRATION

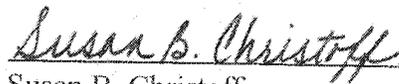
2014

Registration Number:  
PHV- 5420-2014

**Nicholas Serrano**

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