

ORIGINAL

IN THE SUPREME COURT OF OHIO

HUNTER T. HILLENMEYER	)	
	)	CASE NO. 14-0235
Appellant,	)	
v.	)	
	)	
CITY OF CLEVELAND BOARD OF	)	On Appeal from the Ohio Board of Tax
REVIEW and NASSIM LYNCH,	)	Appeals
CLEVELAND TAX ADMINISTRATOR	)	
	)	
Appellees.	)	Board of Tax Appeals Case No. 2009-3688

MOTION FOR ADMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov. Bar R. XII(2)(A)(6), Ryan P. McManus, attorney for Appellant Hunter T. Hillenmeyer, hereby moves the Supreme Court of Ohio to grant him permission to appear pro hac vice and participate as counsel in this case for Appellant Hunter T. Hillenmeyer.

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

Massachusetts, admitted December 10, 2008, BBO #270780

U.S. Supreme Court, admitted January 13, 2014

U.S. Court of Appeals for the First Circuit, admitted October 28, 2014, No. 1166723

U.S. Court of Appeals for the Third Circuit, admitted March 6, 2012

U.S. Court of Appeals for the Fifth Circuit, admitted January 7, 2011

U.S. District Court for the District of Massachusetts, admitted March 31, 2014

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).

FILED

NOV 21 2014

CLERK OF COURT  
SUPREME COURT OF OHIO

Richard C. Farrin (0022850), 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.

Dated: November 20, 2014

Respectfully submitted,



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36 Delta Lane  
Scituate, MA 02066  
(Residential Address)

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion to Appear Pro Hac Vice, including all attachments, was sent by first-class mail to all known parties and attorneys of record on this 21st day of November, 2014.

Linda L. Bickerstaff (0052101)  
City of Cleveland Department of Law  
205 West St. Clair Avenue  
Cleveland, OH 44113

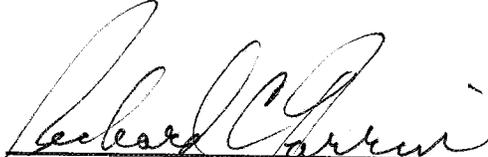
COUNSEL FOR APPELLEES  
CITY OF CLEVELAND BOARD  
OF REVIEW and NASSIM LYNCH,  
CLEVELAND TAX ADMINISTRATOR

Eric E. Murphy (0083284)  
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COUNSEL FOR *AMICUS CURIAE* NATIONAL FOOTBALL  
LEAGUE PLAYERS ASSOCIATION, MAJOR LEAGUE BASEBALL  
PLAYERS ASSOCIATION, NATIONAL HOCKEY LEAGUE  
PLAYERS ASSOCIATION, and NATIONAL BASKETBALL PLAYERS  
ASSOCIATION

  
Richard C. Farrin (0022850)

IN THE MATTER OF THE MOTION OF

CASE NO. 14-0235

Ryan P. McManus

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

**FOR PERMISSION TO APPEAR PRO HAC VICE**

Ryan P. McManus 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):

Massachusetts

U.S. Court of Appeals for the Fifth Circuit

U.S. Supreme Court

U.S. Court of Appeals for the Third Circuit

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):

\_\_\_\_\_

*[Handwritten Signature]*  
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 20<sup>th</sup> day of November,  
20 14, in the state of BOSTON MA and county of SUFFOLK.

 **ROBIN A. MIROLLO**  
Notary Public  
Commonwealth of Massachusetts  
My Commission Expires  
April 16, 2015

*[Handwritten Signature]*  
SIGNATURE OF NOTARY PUBLIC\*

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

**Addendum to Affidavit of Ryan P. McManus**

**I have been admitted to practice in the following additional jurisdictions:**

**U.S. Court of Appeals for the First Circuit (No. 1166723)**

**U.S. District Court for the District of Massachusetts**

# THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

**Ryan McManus**

FOR PRO HAC VICE REGISTRATION

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

Certificate of  
PRO HAC VICE  
REGISTRATION

2014

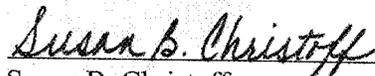
Registration Number:

PHV- 5831-2014

**Ryan McManus**

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