

ORIGINAL

IN THE SUPREME COURT OF OHIO

REGIS F. LUTZ, et al.,

Case No. 15-0545

Plaintiffs-Respondents,

FILED

On Review of Certified Questions
From the United States District
Court, Northern District of Ohio,
Eastern Division

v.

JUL 07 2015

CHESAPEAKE APPALACHIA, L.L.C.

CLERK OF COURT

SUPREME COURT OF OHIO

Case No. 4:09-cv-2256

Defendant-Petitioner.

MOTION FOR PERMISSION TO APPEAR PRO HAC VICE

Pursuant to Gov.Bar R. XII(2)(A)(6), Matthew A. Haynie, attorney for the American Petroleum Institute ("API"), hereby moves the Court to grant him permission to appear pro hac vice and participate as counsel in this case for API.

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, and any attorney registration numbers: District of Columbia (Bar No. 990561), admitted on December 7, 2009; Texas (Bar No. 24065392), admitted on November 7, 2008.

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).

L. Bradfield Hughes (0070997), 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.

Matthew A. Haynie by L.B. Hughes
(0070997)
per tel. authority
PHV-7475-2015
American Petroleum Institute
1220 L. Street, N.W.
Washington, D.C. 20005
(202) 682-8000 (telephone)
HaynieM@api.org

Residential address:
3517 13th St. NW #102
Washington, D.C. 20010

IN THE MATTER OF THE MOTION OF

CASE NO. 2015-0545

Matthew Alan Haynie

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

FOR PERMISSION TO APPEAR PRO HAC VICE

Matthew Alan Haynie 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

Texas

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):



[Signature]
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 30 day of June,

20 15, in the state of the District of Columbia and county of the District of Columbia.

Yvette M Cordone
Notary Public, District of Columbia
My Commission Expires 5/31/2020

[Signature]
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

Matthew Haynie

FOR PRO HAC VICE REGISTRATION

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

Certificate of
PRO HAC VICE
REGISTRATION

2015

Registration Number:

PHV- 7475-2015

Matthew Haynie

_____, 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

Susan B. Christoff
Director, Attorney Services

Expires December 31, 2015

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of July, 2015, he served a copy of the foregoing Motion for Admission Pro Hac Vice upon the following counsel for the parties by mailing it to them via ordinary United States first-class mail, postage prepaid:

DANIEL T. DONOVAN
KIRKLAND & ELLIS LLP
655 Fifteenth Street, N.W.
Washington, D.C. 20005

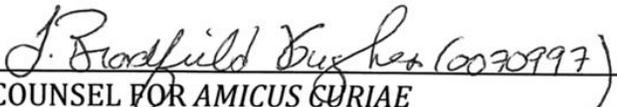
JOHN K. KELLER
VORYS SATER SEYMOUR AND PEASE LLP
52 East Gay Street
Columbus, Ohio 43215

KEVIN C. ABBOTT
NICOLLE R. SNYDER BAGNELL
REED SMITH LLP
225 Fifth Avenue
Pittsburgh, Pennsylvania 15222

JAMES A. LOWE
LOWE EKLUND & WAKEFIELD Co., LPA
1660 West Second Street
610 Skylight Office Tower
Cleveland, Ohio 44113-1454

O. JUDSON SCHEAF III
BEN L. PFEFFERLE III
MCDONALD HOPKINS LLC
250 West Street, Suite 550
Columbus, Ohio 43215

MICHAEL W. WISE
ADAM C. SMITH
MCDONALD HOPKINS LLC
600 Superior Ave., East, Suite 2100
Cleveland, Ohio 44114


COUNSEL FOR AMICUS CURIAE
AMERICAN PETROLEUM INSTITUTE