



**GODWIN RONQUILLO PC**

DONALD E. GODWIN (GODWD 5022) (*pro hac vice*)

Email [dgodwin@godwinronquillo.com](mailto:dgodwin@godwinronquillo.com)

BRUCE W. BOWMAN, JR. (*pro hac vice*)

Email [bbowman@godwinronquillo.com](mailto:bbowman@godwinronquillo.com)

JENNY L. MARTINEZ (*pro hac vice*)

Email [jmartinez@godwinronquillo.com](mailto:jmartinez@godwinronquillo.com)

FLOYD R. HARTLEY, JR. (*pro hac vice pending*)

Email [fhartley@godwinronquillo.com](mailto:fhartley@godwinronquillo.com)

GAVIN E. HILL (*pro hac vice pending*)

Email [ghill@godwinronquillo.com](mailto:ghill@godwinronquillo.com)

1201 Elm Street, Suite 1700

Dallas, Texas 75270-2041

Telephone: 214.939.4400

Facsimile: 214.760.7332

and

R. ALAN YORK (*pro hac vice*)

Email [ayork@godwinronquillo.com](mailto:ayork@godwinronquillo.com)

1331 Lamar, Suite 1665

Houston, Texas 77010

Telephone: 713.595.8300

Facsimile: 713.425.7594

and

**s/ John N. Leach**

JOHN N. LEACH (LEACJ2634)

Email [jnl@helmsinglaw.com](mailto:jnl@helmsinglaw.com)

JOSEPH P. H. BABINGTON (BABIJ7938)

Email [jpb@helmsinglaw.com](mailto:jpb@helmsinglaw.com)

RUSSELL C. BUFFKIN (BUFFR6510)

Email [rcb@helmsinglaw.com](mailto:rcb@helmsinglaw.com)

**HELMSING, LEACH, HERLONG, NEWMAN  
& ROUSE, P.C.**

Post Office Box 2767

Mobile AL 36652

Telephone: 251.432.5521

Facsimile: 251.432.0633

**ATTORNEYS FOR DEFENDANT,  
HALLIBURTON ENERGY SERVICES, INC.**

## CERTIFICATE OF SERVICE

I hereby certify that I have on this 26<sup>th</sup> day of June, 2010, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the court's electronic filing system. I also certify that I have mailed this filing by United States Postal Service to all counsel of record who are not registered to receive electronic service by operation of the court's electronic filing system.

Jere L. Beasley, Esquire  
Rhon E. Jones, Esquire  
David B. Byrne, III, Esquire  
John E. Tomlinson, Esquire  
J. Parker Miller, Esquire  
BEASLEY, ALLEN, CROW, METHVIN, PORTIS  
& MILES, PC  
Post Office Box 4160  
Montgomery, AL 36103-4160  
*Counsel for Plaintiffs*

Christopher D. Boutwell, Esquire  
BEASLEY, ALLEN, CROW, METHVIN, PORTIS  
& MILES, PC  
415 East Commerce Street, Suite 215  
Greenville, AL 36037  
*Counsel for Plaintiffs*

A. Danner Frazer, Jr., Esquire  
Robert J. Mullican, Jr., Esquire  
FRAZER GREENE UPCHURCH & BAKER  
Post Office Box 1686  
Mobile, AL 36633  
*Counsel for Cameron International Corp.*

BP, PLC  
CT Corporation  
1200 South Pine Island Road  
Plantation, FL 33324

John M. Johnson, Esquire  
Adam K. Peck, Esquire  
William H. Brooks, Esquire  
Marchello D. Gray, Esquire  
LIGHTFOOT, FRANKLIN & WHITE, L.L.C.  
400 North 20th Street  
Birmingham, AL 35203  
*Counsel for BP America, Inc. and  
BP Products North America, Inc.*

Richard C. Godfrey, Esquire  
John T. Hickey, Jr., Esquire  
James Andrew Langan, Esquire  
KIRKLAND & ELLIS, LLP  
300 N. LaSalle  
Chicago, IL 60654  
*Counsel for BP America, Inc. and  
BP Products North America, Inc.*

David J. Beck, Esquire  
BECK, REDDEN & SECRET, LLP  
One Houston Center  
1221 McKinney Street, Suite 4500  
Houston, TX 77010  
*Counsel for Cameron International Corp.*

**s/ John N. Leach**

Of counsel

## APPLICATION FOR ADMISSION TO PRACTICE

The undersigned attorney hereby applies for admission to practice before the United States District Court for the Southern District of Alabama (check one) \_\_\_\_\_ Generally, or  *Pro Hac Vice* and submits the following:

**1. State:**

**(a) Full name:** Gavin Eugene Hill

**(b) Present business address:** 1201 Elm Street, Suite 1700, Dallas, Texas 75270

**(c) Office telephone number and fax number:** 214-939-4685, 214-760-7332

**(d) Name of your firm, company or agency:** Godwin Ronquillo PC

**(e) Last four digits of social security number:** 0855

**2. State the law school(s) you have attended, specifying the dates and the degrees(s) you have received:**

University of Virginia School of Law, 1996, J.D.

**3. (a) Are you a member in good standing of the bar of the Supreme Court of Alabama?**

No.

**(b) If so, state the month and year you were admitted:**

**(c) Are you a member in good standing of the bar of any other state's highest court?**

Yes.

**(d) If so, name the state(s) and the month and year you were admitted:**

Texas, November 1996

**4. Name the federal courts, if any, to which you are presently admitted to practice, and are in good standing:**

See Attached.

**5. Are you regularly engaged in the practice of law in the State of Alabama?**

No.

**6. (a) Have you ever sought admission to practice before any federal or state appellate or trial court and been refused admission, either on a temporary or permanent basis?**

No.

**(b) If so, describe fully the circumstances:**

**7. (a) Do you presently have pending against you any disciplinary charges by any court or bar association?**

No.

**(b) If so, describe fully the circumstances:**

**8. (a) Have you ever been cited for contempt by any federal or state court ?**

No.

**(b) If so, describe fully the circumstances:**

9. (a) Have you ever been disbarred or suspended from practice or in any other way disciplined in any federal or state appellate or trial court?  
No.  
(b) If so, describe fully the circumstances:
10. Do you understand the Code of Professional Responsibility of the Alabama State Bar, as amended to date, and do you agree to comport yourself in accordance with it in connection with your practice in this Court?  
Yes.
11. Do you agree to read and abide by the Local Rules of the United States District Court for the Southern District of Alabama, and to familiarize yourself therewith prior to filing any case and/or pleadings or appearing before this Court, and to familiarize yourself with the Standing Orders of this Court and the Administrative Rules for Electronic Filing?  
Yes.  
(The Standing Orders of this Court and Administrative Rules for Electronic Filing are available for your review in the Clerk's Office or on the web at <http://www.als.uscourts.gov/>.)
12. I declare under penalty of perjury that the foregoing is true and correct.

  
\_\_\_\_\_  
Applicant

Date: 6/4/10

**Oath of Admission:**

I DO SOLEMNLY SWEAR (OR AFFIRM) THAT I WILL DEMEAN MY SELF AS AN ATTORNEY, ACCORDING TO THE BEST OF MY LEARNING AND ABILITY, AND WITH ALL GOOD FIDELITY, AS WELL TO THE COURT AS TO THE CLIENT; THAT I WILL USE NO FALSEHOOD OR DELAY ANY PERSON'S CAUSE FOR LUCRE OR MALICE, AND THAT I WILL SUPPORT THE CONSTITUTION OF THE STATE OF ALABAMA AND OF THE UNITED STATES, SO LONG AS I CONTINUE A CITIZEN THEREOF, SO HELP ME GOD.

  
\_\_\_\_\_  
Signature of Attorney

**MOTION FOR GENERAL ADMISSION**

(Not required for Pro Hac Vice admission)

\*The undersigned \_\_\_\_\_, a member of the bar of the United States District Court for the Southern District of Alabama, hereby moves that the foregoing applicant be admitted to practice as an attorney of this Court this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
Signature of Movant

**\*NOTE: MOVANT MUST APPEAR WITH APPLICANT AT TIME OF ADMISSION.**

US Northern District of Texas – June 20, 2003  
US Western District of Texas – March 6, 2006  
US Eastern District of Texas – February 4, 2004  
US Southern District of Texas – July 3, 2003

# *Certificate of Good Standing*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

I, **KAREN MITCHELL**, Clerk of the United States District Court, Northern District of Texas,  
DO HEREBY CERTIFY that **Gavin Eugene Hill**, Bar # **00796756**, was duly admitted to practice in said  
Court on **06/20/03**, and is in good standing as a member of the bar of said Court.

Signed at **Dallas**, Texas on **06/07/10**

*Karen Mitchell*

BY: *Melanda Hodge*  
Deputy Clerk