

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

WILLIAM D. GREGOIRE; VERONICA G.
STELLY; TOBY J. STELLY

\* CIVIL ACTION
\* NO. 10-CV-01351
\* SECTION "N"
\* DIVISION "5"
\* JUDGE KURT D. ENGELHARDT
\* MAGISTRATE
ALMA CHASEZ

versus

TRANSOCEAN, LTD.; TRANSOCEAN
OFFSHORE DEEPWATER DRILLING, INC.;
TRANSOCEAN DEEPWATER INC.; BP,
PLC; BP PRODUCTS NORTH AMERICA,
INC.; BP EXPLORATION & PRODUCTION,
INC.; HALLIBURTON ENERGY SERVICES,
INC.; HALLIBURTON COMPANY;
CAMERON INTERNATIONAL
CORPORATION; ABC INSURANCE
COMPANY; DEF INSURANCE COMPANY;
GHI INSURANCE COMPANY; JKL
INSURANCE COMPANY; MNO
INSURANCE COMPANY; PQR INSURANCE
COMPANY; STU INSURANCE COMPANY;
XYZ INSURANCE COMPANY

\* \* \* \* \*

EX PARTE MOTION TO ENROLL COUNSEL PRO HAC VICE

NOW INTO COURT comes Don K. Haycraft, counsel for defendants BP Exploration &
Production Inc. and BP Products North America, Inc. (collectively the "BP Defendants") and
moves this Court to admit Wendy L. Bloom, as counsel pro hac vice to this Court pursuant to
Rule 83.2.6 of the Local Rules of the United States District Court for the Eastern District of
Louisiana. In support of this motion, Don K. Haycraft avers as follows:

1.

Wendy L. Bloom is a member of the bar of the State of Illinois and will represent the BP Defendants along with Liskow & Lewis, its counsel of record in the referenced case.

2.

The Affidavit of Wendy L. Bloom, attached hereto as Exhibit 1, shows that Ms. Bloom has been admitted to practice and is in good standing before all courts of the State of Illinois. In addition, a Certificate of Good Standing issued by the Clerk for the Supreme Court for the State of Illinois is attached to his Affidavit.

3.

No disciplinary proceedings or criminal charges have been instituted against Wendy L. Bloom as evidenced by her Affidavit.

4.

The mailing address of Ms. Bloom is Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois, 60654. Her telephone number is (312) 862-2000, and her facsimile number is (312) 862-2200. Her email address is wendy.bloom@kirkland.com.

WHEREFORE, Don K. Haycraft moves this court to enroll Wendy L. Bloom as co-counsel of record *pro hac vice* for defendants BP Exploration & Production Inc. and BP Products North America, Inc.

Respectfully submitted,

/s/ Don K. Haycraft

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***Attorneys for BP Exploration & Production Inc. and  
BP Products North America, Inc.***

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 28, 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.

/s/ Don K. Haycraft \_\_\_\_\_

Don K. Haycraft