

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

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

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

* CIVIL ACTION
* NO. 10-CV-01351
* SECTION "N"
* DIVISION "5"
* JUDGE KURT D. ENGELHARDT
* MAGISTRATE ALMA CHASEZ
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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 Richard C. Godfrey, P.C., 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.

Richard C. Godfrey, P.C., 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 Richard C. Godfrey, attached hereto as Exhibit 1, shows that Mr. Godfrey 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 Richard C. Godfrey as evidenced by his Affidavit.

4.

The mailing address of Mr. Godfrey is Kirkland & Ellis LLP, 300 North LaSalle Street, Chicago, Illinois, 60654. His telephone number is (312) 862-2000, and his facsimile number is (312) 862-2200. His email address is rgodfrey@kirkland.com.

WHEREFORE, Don K. Haycraft moves this court to enroll Richard C. Godfrey, P.C., 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

Donald R. Abaunza (Bar #2273)

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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