Filed 03/07/2006

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IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

VALENCIA M. MCCLATCHEY,)
Plaintiff,)) Civil Action No. 05-145J
v)
THE ASSOCIATED PRESS,) JURY TRIAL DEMANDED
Defendant.)
)_

MOTION FOR ADMISSION PRO HAC VICE OF MICHAEL BERRY

Defendant The Associated Press ("AP") respectfully moves for an Order permitting the admission pro hac vice of Michael Berry to try this case in whole or in part as counsel, and in support thereof, offers the attached Declaration of Gayle C. Sproul, counsel for AP

WHEREFORE, the undersigned respectfully requests that the Court grant the Motion for Admission Pro Hac Vice of Michael Berry

Dated: March 7, 2006

Respectfully submitted,

LEVINE SULLIVAN KOCH & SCHULZ, L.L.P.

By: <u>/s/ Gayle C. Sproul</u> Gayle C. Sproul, I D. No 38833 2112 Walnut Street, Third Floor Philadelphia, Pennsylvania 19103 (215) 988-9778 (215) 988-9750 (Fax)

Attorneys for The Associated Press

CERTIFICATE OF SERVICE

I, Gayle C. Sproul, certify that on March 7, 2006, I caused a true and correct copy of the foregoing Motion for Admission *Pro Hac Vice* of Michael Berry to be served through the Court's ECF System to the following counsel of record:

Douglas M. Hall Kara L. Szpondowski Niro, Scavone, Haller & Niro 181 West Madison, Suite 4600 Chicago, Illinois 60602-4515

John E. Hall Eckert Seamans Cherin & Mellott, LLC USX Tower 600 Grant Street, 44th Floor Pittsburgh, Pennsylvania 15219

/s/ Gayle C. Sproul
Gayle C Sproul