

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

VALENCIA M. McCLATCHEY,	)	
	)	
Plaintiff,	)	C.A. No. 05-145 j
	)	
vs.	)	
	)	
THE ASSOCIATED PRESS,	)	
	)	
Defendant.	)	

MOTION FOR LEAVE TO REQUEST ADMISSION PRO HAC VICE

Plaintiff, Valencia M. McClatchey, by her attorney, John E. Hall, Esquire and Eckert Seamans Cherin & Mellott, LLC, member of the bar of the United States District Court for the Western District of Pennsylvania, moves this Honorable Court for leave to request Admission Pro Hac Vice of Paul K. Vickrey, Esquire for purposes of this particular proceeding, stating as follows:

1. John E. Hall, Esquire is with the law firm of Eckert Seamans Cherin & Mellott, LLC, U.S. Steel Tower, 600 Grant Street, 44<sup>th</sup> Floor, Pittsburgh, PA 15219 and is a member in good standing of the bar of the United States District Court for the Western District of Pennsylvania.

2. Paul K. Vickrey, Esquire, of the law firm of Niro Scavone Haller & Niro, 181 W. Madison St., Suite 4600, Chicago, IL 60602 is counsel for plaintiff, Valencia M. McClatchey.

3. Paul K. Vickrey, Esquire is a member in good standing of the State and Federal bars of Illinois. (Please see Exhibit "A", attached hereto).

4. Plaintiff, Valencia M. McClatchey, desires that attorney Paul K. Vickrey assist in representing her interests because of their familiarity with the parties and the causes of action.

5. Plaintiff, Valencia M. McClatchey, further desires that John E. Hall, Esquire, as a member of the bar of this Court, remain as counsel of record, together with Paul K. Vickrey, Esquire. Any service of motions, pleadings and Orders of Court may be directed to John E. Hall, Esquire at Eckert Seamans Cherin & Mellott, LLC.

WHEREFORE, the movant, John E. Hall, Esquire, respectfully moves this Honorable Court for an Order granting leave to permit the admission Pro Hac Vice of Paul K. Vickrey, Esquire, for purposes of this particular action.

Respectfully submitted,

Dated: April 13, 2007



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John E. Hall, Esquire  
Pa. I.D. No. 11095

ECKERT SEAMANS CHERIN & MELLOTT, LLC  
600 Grant Street, USX Tower, 44th Floor  
Pittsburgh, PA 15219  
(412) 566-6000

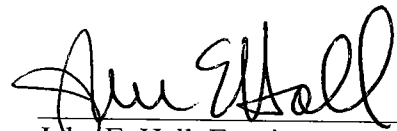
Attorneys for Plaintiff,  
Valencia M. McClatchey

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the within Motion for Admission Pro Hac Vice of Paul K. Vickrey to the United States District Court for the Western District of Pennsylvania was forwarded to all counsel of record, via first class mail, postage prepaid, this 13th day of April, 3007.

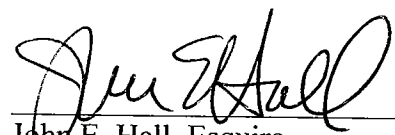
Gayle C. Sproul, Esquire  
Levine Sullivan Koch & Schultz, L.L.P.  
2004 Makefield Road  
Yardley, PA 19067

Robert Penchina, Esquire  
Levine Sullivan Koch & Schultz, L.L.P.  
230 Park Avenue, Suite 1160  
New York, NY 10169

  
\_\_\_\_\_  
John E. Hall, Esquire

CERTIFICATE OF ECF REGISTRATION PURSUANT TO Misc. No. 06-151

I hereby certify that your moving counsel is a registered user of ECF in the United States District Court for the Western District of Pennsylvania. I further certify that undersigned counsel has read, knows and understands the Local Rules of Court.

  
\_\_\_\_\_  
John E. Hall, Esquire