

In the Adams County, Ohio Court of Common Pleas

Shawn D. Cooley et al.

v.

Joseph Edgar Foreman, a/k/a Afroman et al.

Case No. CVH-20230069

FILED
ADAMS COUNTY
CLERK OF COURTS
2023 APR 19 PM 2:13
Shawn D. Cooley
CLERK

**MOTION FOR PERMISSION TO APPEAR
PRO HAC VICE**

Pursuant to Gov. Bar R. XII(2)(A)(6), Vera Eidelman, attorney for proposed amici American Civil Liberties Union hereby moves the Court of Common Pleas to grant Vera Eidelman permission to appear pro hac vice and participate as co-counsel in this case for amici curiae.

Movant represents that the following is a list of the jurisdictions in which attorney Eidelman has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers:

New York, Second Appellate Department (admitted 05/29/2019; attorney registration number 564608) (active); California (admitted 01/21/2016; attorney registration number 308535) (inactive).

Movant represents that attorney Eidelman has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov. Bar R. XII(2)(A)(5). David J. Carey, an active Ohio attorney in good standing, has agreed to associate with Movant on this case.

The affidavit required by Gov. Bar R. XII(2)(A)(6), a copy of Movant's certificate of pro hac vice registration furnished by the Supreme Court of Ohio Office of Bar Admissions, and a certificate indicating service of this Motion on all

known parties and attorneys of record are attached. Movant understands that, if this Motion is granted, Movant must file a Notice of Permission to Appear Pro Hac Vice and a copy of the Order granting permission with the Supreme Court of Ohio Office of Bar Admissions within thirty days of the Order.

Dated: April 19, 2023

Respectfully submitted,

/s Vera Eidelman

Vera Eidelman (PHV 25390)
American Civil Liberties Union
125 Broad Street, 17th Floor
New York, NY 10004
212-549-2500
212-549-2649
veidelman@aclu.org

Residential address:

[See attached Redacted Personal Identifier Form.]

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2023, the foregoing was filed with this Court via facsimile transmission and overnight mail. I further certify that a copy of the foregoing was served to the counsel below by regular and electronic mail.

Robert A. Klingler
895 Central Ave., Ste. 300
Cincinnati, OH 45202
rak@klinglerlaw.com

Counsel for Plaintiffs

Tyler Cantrell
225 N. Cross St.
West Union, OH 45693
tystang2001@yahoo.com

Bruce Rivers
701 Fourth Avenue S.
Minneapolis, MN 55415
riverslaw@aol.com

Counsel for Defendants Joseph Foreman and Hungry Hustler Records

Arthur West
120 State Ave. NE, #1497
Olympia, WA 98501

Proposed Intervenor

/s/ Vera Eidelman
Vera Eidelman (PHV 25390)

IN THE MATTER OF THE MOTION OF

Vera Eidelman

CASE NO. 20230069

FILED
ADAMS COUNTY
CLERK OF COURTS
2023 APR 19 PM 2:13
Vera Eidelman
CLERK

FOR PERMISSION TO APPEAR PRO HAC VICE

Vera Eidelman

AFFIDAVIT OF
OUT-OF-STATE ATTORNEY
Gov. Bar R. XII, Section 2(A)(7)

being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdictions (attach additional jurisdictions if necessary):

[REDACTED]

c. Choose one:

- ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
- ☐ I am currently suspended from the practice of law in the following jurisdictions:

d. Choose one:

- ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
- ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

V. Eidelman
SIGNATURE OF APPLICANT

Sworn to or affirmed before me and subscribed in my presence the 19 day of April, 2023, in the state of New York and county of New York.

ELIZABETH HUL GYORI
NOTARY PUBLIC-STATE OF NEW YORK
No. 02GY6419377
Qualified in Kings County
*Affix stamp & seal here in 03/06/2025

Elizabeth Hul Gyori
SIGNATURE OF NOTARY PUBLIC*
ELIZABETH HUL GYORI
NOTARY PUBLIC-STATE OF NEW YORK
No. 02GY6419377
Qualified in Kings County
My Commission Expires 07-06-2026

IN THE SUPREME COURT OF OHIO
PERSONAL IDENTIFIER FORM

FILED
ADAMS COUNTY
CLERK OF COURTS

2023 APR 19 PM 2:13

Shawn D. Cooley et al.
Appellant,
Relator,
Petitioner, v.
Joseph Edgar Foreman et al.
Appellee.
Respondent.

Case No. 20230069
[Signature]
CLERK

Confidential Personal Identifiers Contained in Filing

(Rule 45(D) of the Rules of Superintendence for the Courts of Ohio. Effective July 1, 2009)

REFERENCE LIST

	COMPLETE PERSONAL IDENTIFIER	CORRESPONDING REFERENCE	LOCATION
	Use this column to list the personal identifiers that have been redacted from the document that is to be placed in the case file.	Use this column to list the reference or abbreviation that will refer to the corresponding complete personal identifier.	Use this column to identify the document or documents where the reference appears in place of the personal identifier.
1.	[REDACTED]	[REDACTED] er form)	[REDACTED]
2.			
3.			
4.			

☐ Check if additional pages are attached.

[Signature]
Signature of person submitting the information
April 18, 2023
Date

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Vera Eidelman

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2023

Registration Number:
PHV- 25390-2023

FILED
ADAMS COUNTY
CLERK OF COURTS
2023 APR 19 PM 2:13
Jana J. Miller
CLERK

Vera Eidelman

_____, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Gina White Palmer
Director, Attorney Services

Expires December 31, 2023