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March 29, 2012

The Honorable Mark A. Karl
Marshall County Circuit Court
Marshall County Courthouse
Seventh Street
Moundsville, WV 26041

**RE: Amanda Anderson, et al. v. Columbian Chemicals Company, et al.
Civil Action No.: 11-C-153K
Marshall County, West Virginia**

Dear Judge Karl:

Enclosed please find a copy of a Motion for *Pro Hac Vice* Admission of Jerry K. Ronecker which has been filed with the Clerk's office on behalf of Olin Corporation in the above-captioned matter. Also enclosed is a proposed Order granting *pro hac vice* admission to Jerry K. Ronecker. If the enclosed Order meets with your approval, I respectfully ask that you endorse the Order and forward it to the Clerk for entry.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

JEFFREY A. HOLMSTRAND

JAH/jmm

Enclosures

cc: All Counsel of Record (w/encl.)
Cheryl L. Wright, Membership Coordinator – WV State Bar (w/encl.)
Jerry K. Ronecker (w/encl.)

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**Flaherty
Sensabaugh
Bonasso** P.L.C.
ATTORNEYS AT LAW

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March 29, 2012

Cheryl L. Wright, Membership Coordinator
The West Virginia State Bar
2006 Kanawha Boulevard, East
Charleston, WV 25311

**RE: Amanda Anderson, et al. v. Columbian Chemicals Company, et al.
Civil Action No.: 11-C-153K
Marshall County, West Virginia**

Dear Ms. Wright:

Enclosed please find a Motion for *Pro Hac Vice* Admission of Jerry K. Ronecker with a Verified Statement of Application attached as Exhibit A on behalf of Defendant, Olin Corporation in the above-captioned matter. A check in the amount of \$350.00 has also been enclosed herewith to cover the applicable application fees.

Thank you for your attention to this matter. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

JEFFREY A. HOLMSTRAND

JAH/jmm

Enclosures

cc: All Counsel of Record (w/encl.)
The Honorable Mark A. Karl (w/encl.)
Jerry K. Ronecker (w/encl.)

fsblaw.com

HUSCH BLACKWELL LLP

General Bank Account-St. Louis

VENDOR NUMBER: 429327
VENDOR NAME: West Virginia State Bar

CHECK NUMBER: 587303
CHECK DATE: 03-26-12

Voucher #	Invoice #	Inv. Date	Invoice Description	Amount Paid
2257553	0480520608032612350002	03-26-12	CRINV 11-C-152H Pick Up Kohrs, Maria	350.00

REFERENCE ID:

CHECK AMOUNT

350.00



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HUSCH BLACKWELL LLP

General Bank Account-St. Louis
190 GARONDELET PLAZA SUITE 600
ST. LOUIS, MO 63105
314-480-1500

CHECK NO: 587303

Enterprise Banking

88-219/1011

CHECK DATE
03-26-12

PAY
THREE HUNDRED FIFTY AND 00/100 Dollar(s)

CHECK AMOUNT

\$350.00*****

TO
THE
ORDER
OF
West Virginia State Bar

TWO SIGNATURES REQUIRED OVER \$10,000.00

THE REVERSE SIDE OF THIS DOCUMENT INCLUDES AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

⑈ 587303 ⑈ ⑆ 101102137 ⑆ 1150000334 ⑈



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March 29, 2012

David R. Ealy, Clerk
Marshall County Circuit Court
600 7th Street
P.O. Drawer B
Moundsville, WV 26041

**RE: Amanda Anderson, et al. v. Columbian Chemicals Company, et al.
Civil Action No.: 11-C-153K
Marshall County, West Virginia**

Dear Mr. Ealy:

Enclosed for filing in the above-captioned matter is an original Motion for *Pro Hac Vice* Admission of Jerry K. Ronecker. Also enclosed is a copy of the proposed Order granting *pro hac vice* admission to Jerry K. Ronecker. Kindly time-stamp the additional copy enclosed and return the same to me in the pre-addressed, postage prepaid envelope provided herein.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

JEFFREY A. HOLMSTRAND

JAH/jmm
Enclosures

cc: All Counsel of Record (w/encl.)
Cheryl L. Wright, Membership Coordinator – WV State Bar (w/encl.)
Jerry K. Ronecker (w/encl.)

fsblaw.com

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA

AMANDA ANDERSON, et al.,)
)
)
Plaintiffs,)
)
)
v.)
)
COLUMBIAN CHEMICALS)
COMPANY, et al.)
)
Defendants)

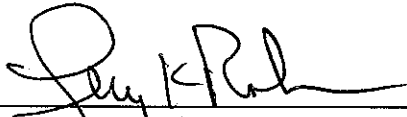
CIVIL ACTION NO. 11-C-153K
(Mark A. Karl, Judge)

RAIN CII CARBON LLC,)
)
Defendant/Third-Party Plaintiff)
)
)
v.)
)
LIBERTY MUTUAL FIRE)
INSURANCE COMPANY, et al.,)
)
Third-Party Defendants)

**MOTION FOR PRO HAC VICE
ADMISSION OF JERRY K. RONECKER**

Comes now, Jerry K. Ronecker, pursuant to Rule 8.0 of the West Virginia Rules for Admission to the Practice of Law in the State of West Virginia and Jeffrey A. Holmstrand, as a member in good standing of the West Virginia State Bar, who agrees to and will be the responsible local attorney in this matter under the aforesaid Rule, and respectfully moves this Court to grant to Jerry K. Ronecker, an attorney who is not licensed and admitted to the practice of law in West Virginia, the privilege to appear in this Court for the purpose of this civil litigation, as an attorney on behalf of the Defendant Olin Corporation.

The verified Statement of Application of Jerry K. Ronecker for Pro Hac Vice Admission is attached hereto as Exhibit A and submitted herewith in support of this Motion.



Jerry K. Ronecker

Husch Blackwell LLP
190 Carondelet Plaza, Suite 600
St. Louis, MO 63105
Telephone: (314) 480-1500
jerry.ronecker@huschblackwell.com



Jeffrey A. Holmstrand (#4893)

Flaherty Sensabaugh Bonasso PLLC
1225 Market Street
Wheeling, WV 26003
Telephone: (304) 230-6600
JHolmstrand@fsblaw.com

Date: MARCH 29, 2012

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA

AMANDA ANDERSON, et al.,)
)
)
Plaintiffs,)
)
v.)
)
COLUMBIAN CHEMICALS)
COMPANY, et al.)
)
Defendants)

CIVIL ACTION NO. 11-C-153K
(Mark A. Karl, Judge)

RAIN CII CARBON LLC,)
)
Defendant/Third-Party Plaintiff)
)
v.)
)
LIBERTY MUTUAL FIRE)
INSURANCE COMPANY, et al.,)
)
Third-Party Defendants)

EXHIBIT A
VERIFIED STATEMENT OF APPLICATION OF
JERRY K. RONECKER PRO HAC VICE ADMISSION

Pursuant to Rule 8.0(b) of the Rules for Admission to the Practice of Law in the State of West Virginia, I, Jerry K. Ronecker, hereby submit the following verified statement in support of the Motion for Admission Pro Hac Vice to appear before this Honorable Court in the above-styled civil action:

1. That I am a member in good standing of the bars of the State of Missouri and Illinois.

2. The name, address and telephone number of the disciplinary agency of the State of Missouri and State of Illinois are as follows:

Missouri:

Office of Chief Disciplinary Counsel Missouri
3335 American Ave.
Jefferson City, MO 65109
(573) 635-7400
Disciplinary Counsel: Alan Pratzel

Illinois

Attorney Registration & Disciplinary Commission
One North Old Capitol Plaza
Suite 333
Springfield, IL 62701-1625
(217) 522-6838

3. I am admitted to practice before the State Courts of Missouri and Illinois, the United States District Court for the Eastern District of Missouri and the United States District Court for the Southern District of Illinois.

4. I am an attorney in the law firm of Husch Blackwell LLP, which has been retained to represent Third-Party Defendant Olin Corporation, in this action. I am not a resident of the State of West Virginia, and do not maintain an office for the practice of law in the State of West Virginia.

5. I wish to appear and participate in this particular case in association with Jeffrey A. Holmstrand, who I understand, based upon reasonable inquiry, is a member of the bar of this Honorable Court.

6. I expressly designate Jeffrey A. Holmstrand, who has an office for the practice of law within the State of West Virginia at the following address: 1225 Market Street, Wheeling, West Virginia, with the telephone number: 304-230-6600 to serve as responsible local attorney in this case.

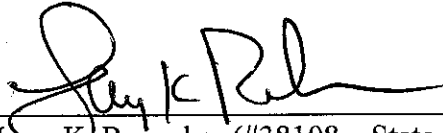
7. I have knowledge of the Local Rules of this Honorable Court and will comply with all laws, rules and regulations of West Virginia state and local governments, where applicable, including taxing authorities and any standard for pro bono civil and criminal defense legal services.

8. Within the preceding 24 months, I have been admitted *pro hac vice* in two matters that are now consolidated in Ernie Anderson, et al. and Dennis F. Moore et al. v. Columbian Chemicals Company, Circuit Court of Marshall County, West Virginia, Civil Action 09-C-220K (“Anderson/Moore lawsuit”). The Amanda Anderson et al. v. Rain CII Carbon, LLC et al. matter involve similar allegations brought against Third-Party Defendant Olin Corporation as those in the Anderson/Moore lawsuit.

9. Based upon a reasonable inquiry, I understand that attorneys in my law firm, Husch Blackwell LLP, have been involved in the following matters before West Virginia tribunals or bodies during the past 24 months as listed on Attachment 1.

10. Pursuant to Rule 8.0(b), a copy of this Verified Statement of Application of Jerry K. Ronecker and payment of the required Three Hundred Fifty Dollars (\$350.00) fee is being provided to the West Virginia State Bar.

WHEREFORE, Jerry K. Ronecker respectfully requests this Honorable Court to approve his Admission Pro Hac Vice in this case, representing Third-Party Defendant Olin Corporation.



Jerry K. Ronecker (#38108 – State of Missouri)
HUSCH BLACKWELL LLP
190 Carondelet Plaza, Suite 600
St. Louis, Missouri 63105
Telephone: (314) 480-1500
Facsimile: (314) 480-1505
Jerry.ronecker@huschblackwell.com

ENDORSED BY:



Jeffrey A. Holmstrand (#4893)
FLAHERTY SENSABAUGH BONASSO PLLC
1225 Market Street
Wheeling, WV 26003
Telephone: (304) 230-6600
JHolmstrand@fsblaw.com

ATTACHMENT 1

ALL MATTERS BEFORE WEST VIRGINIA TRIBUNALS OR JUDICIAL BODIES

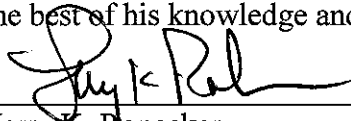
	CASE NAME	CASE NO.	TRIBUNAL
1.	<i>Chavel v. East Cumberland, et al.</i>	Case No. 10-C-1423	In the Circuit Court of Kanawha County, West Virginia
2.	<i>Elliott v. Olin Corporation et al.</i>	Case No. 10-C-89	In the Circuit Court of Wetzel County, West Virginia
3.	<i>Bienkoski v. Boyce et al.</i>	Case No. 1:09 CV-00068	United States District Court for the Northern District of West Virginia
4.	<i>In re: Douglas Sporting Goods Company, Incorporated</i>	Case No. 07-10147	United States bankruptcy Court, Southern District of West Virginia
5.	<i>Fibernet, LLC v. Suddenlink Communications, et al.</i>	Case No. 11-C-389	In the Circuit Court of Kanawha County, West Virginia
6.	<i>Ernie Anderson et al. and Denis Moore et al. v. Columbian Chemicals Company et al. (consolidated)</i>	Case No. 09-C-220K	In the Circuit Court of Marshall County, West Virginia

VERIFICATION

STATE OF MISSOURI:

COUNTY OF ST. LOUIS:

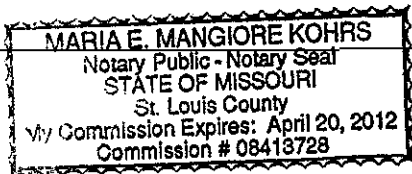
Jerry K. Ronecker, being first duly sworn, upon his oath, says that he has read and knows the contents of the foregoing VERIFIED STATEMENT OF APPLICATION OF JERRY K. RONECKER FOR PRO HAC VICE ADMISSION, and upon his oath says that the facts and allegations therein contained are true and correct to the best of his knowledge and belief.



Jerry K. Ronecker

Subscribed and sworn to me this 28th day of March, 2012.

My Commission Expires:





NOTARY PUBLIC

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA

AMANDA ANDERSON, et al.,)
)
)
Plaintiffs,)
)
v.)
)
COLUMBIAN CHEMICALS)
COMPANY, et al.)
)
Defendants)

CIVIL ACTION NO. 11-C-153K
(Mark A. Karl, Judge)

RAIN CII CARBON LLC,)
)
Defendant/Third-Party Plaintiff)
)
v.)
)
LIBERTY MUTUAL FIRE)
INSURANCE COMPANY, et al.,)
)
Third-Party Defendants)

ORDER

This matter is before the Court on the Motion for Admission Pro Hac Vice of Jerry K. Ronecker, pursuant to Rule 8.0 of the West Virginia Rules of Admission to the Practice of Law. It appearing to the Court that the aforesaid motion is in compliance with Rule 8.0 of the West Virginia Rules for Admission to the Practice of Law, and inasmuch as Jeffrey A. Holmstrand, an attorney duly admitted to practice before this Court, has endorsed the Pro Hac Vice admission of Jerry K. Ronecker, and represented that he will be the responsible local attorney as required by the aforesaid Rule 8.0, it is hereby:

ORDERED that Jerry K. Ronecker be and is hereby admitted to the practice of law in West Virginia for the sole and limited purpose of participating as co-counsel on behalf of the Third-Party Defendant Olin Corporation, in the above-styled civil action. It is further:

ORDERED, pursuant to Rule 8.0 of the West Virginia Rules of Admission to the Practice of Law, that the local attorney shall be required to attend all hearings, trials, depositions and other actions in these proceedings.

ENTERED this _____ day of _____, 2012.

The Honorable Mark A. Karl, Judge

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA

AMANDA ANDERSON, et al.,

Plaintiffs,

v.

COLUMBIAN CHEMICALS COMPANY,
a foreign Corporation, et al.,

CIVIL ACTION NO. 11-C-153K
(Mark A. Karl, Judge)

Defendants.

RAIN CII CARBON LLC,

Defendant/Third-Party
Plaintiff,

v.

LIBERTY MUTUAL FIRE INSURANCE
COMPANY, et al.,

Third-Party Defendants.

CERTIFICATE OF SERVICE

Service of the foregoing *MOTION FOR PRO HAC VICE ADMISSION OF JERRY K. RONECKER* was had upon the parties herein by mailing a true copy thereof, by regular United States mail, postage prepaid, to the following at their last known addresses as follows, on this 26th day of March, 2012.

PLAINTIFFS	
Louis H. Kourey Jonathan E. Turak GOLD, KHOUREY & TURAK, L.C. 510 Tomlinson Avenue Moundsville, WV 26041	

COLUMBIAN CHEMICALS COMPANY, DALE CLARK, JEFF HOLMES, DAVE HOLMES, GARY SMITH, MIKE WEST, JOHN BLAIR, PAUL PITTMAN, JOHN KUHN, AND CRAIG LANDIS

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Carmen R. Toledo
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Peter L. Hilbert, Jr.
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& ANDERSON PA
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LIBERTY MUTUAL FIRE INSURANCE COMPANY

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Laura A. Foggan
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Washington, DC 20006

NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, NEW HAMPSHIRE INSURANCE COMPANY ILLINOIS NATIONAL INSURANCE COMPANY

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 ZIMMER KUNZ PLLC
 206 Spruce Street
 Morgantown, WV 26505

Richard W. Bryan
 Michele L. Dearing
 Noel E. Warren
 JACKSON & CAMPBELL PC
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 Washington, DC 20036

GREAT AMERICAN INSURANCE COMPANY OF NEW YORK

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 Pamela C. Deem
 ALLEN GUTHRIE & THOMAS PLLC
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 Charleston, WV 25333-3394

Jonathan H. Pittman
 Margot L. Green
 CROWELL & MORING LLP
 1001 Pennsylvania Avenue, NW
 Washington, DC 20004-2595

AXIS SURPLUS INSURANCE COMPANY

James A. Varner, Sr.
 Debra Tedeschi Herron
 Richard R. Marsch
 MCNEER HIGHLAND MCMUNN
 & VARNER, L.C.
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 CLEMENTS & SMITH, P.C.
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 Pittsburgh, PA 15222

Thomas G. Drennan
 TRESSLER LLP
 233 S Wacker Drive, 22nd Floor
 Chicago, IL 60606

XL SPECIALTY INSURANCE COMPANY

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 Daniel W. Levin
 JONES HIRSCH CONNORS & BULL, PC
 One Battery Park Plaza, 28th Floor
 New York, NY 10004

Frank E. Simmerman, Jr.
 Chad L. Taylor
 SIMMERMAN LAW OFFICE, PLLC
 254 East Main Street
 Clarksburg, WV 26301

CONSOL ENERGY, INC. AND MCELROY COAL COMPANY	
Samuel H. Simon HOUSTON HARBAUGH PC Three Gateway Center 401 Liberty Avenue, 22nd Floor Pittsburgh, PA 15222	
HANLIN CHEMICALS – WEST VIRGINIA	
Hanlin Chemicals-West Virginia c/o James Lightner P.O. Drawer 1 Moundsville, WV 26041	
HONEYWELL INTERNATIONAL, INC.	
Clifford K. Kinney, Jr. SPILMAN THOMAS & BATTLE, PLLC 300 Kanawha Blvd., East P.O. Box 273 Charleston, WV 25321	Christina S. Terek SPILMAN THOMAS & BATTLE, PLLC 1217 Chapline Street P.O. Box 831 Wheeling, WV 26003
WESTCHESTER SURPLUS LINES INSURANCE COMPANY	
Charles S. Piccirillo Benjamin M. Mishoe SHAFFER & SHAFFER 330 State Street Madison, WV 25130	Joseph A. Ziemianski COZEN O'CONNOR 1221 McKinney Street, Suite 2900 Houston, TX 77010
Aaron Tilley COZEN O'CONNOR 45 Broadway, 28 th Floor New York, NY 10006	
THE OHIO POWER COMPANY AND WHEELING POWER COMPANY	
Jeffrey A. Grove BACHMANN, HESS, BACHMANN & GARDEN, PLLC 1226 Chapline Street P.O. Box 351 Wheeling, WV 26003	

PPG INDUSTRIES, INC.	
Melvin F. O'Brien J.R. Hall DICKIE, MCCAMEY & CHILCOTE, LC 1233 Main Street, Suite 2002 Wheeling, WV 26003	Michael J. Sweeney DICKIE, MCCAMEY & CHILCOTE, LC Two PPG Place, Suite 400 Pittsburgh, PA 15222 <i>Admitted Pro Hac Vice</i>
FIRST ENERGY GENERATION CORP.	
Douglas J. Weber FirstEnergy Corporation 76 S. Main St., 18 th Fl. Akron, OH 44308	
ORMET CORPORATION AND ORMET PRIMARY ALUMINUM CORPORATION	
William A. Kolibash PHILLIPS, GARDILL, KAISER & ALTMAYER, PLLC 61 Fourteenth Street Wheeling, WV 26003	
JAMES RIVER INSURANCE COMPANY	
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STARR MARINE AGENCY, INC.	
Dennis A. Watson GROGAN GRAFFAM, P.C. Four Gateway Center, 12 th Floor Pittsburgh, PA 15222	
TRAVELERS CASUALTY AND SURETY COMPANY AND GULF UNDERWRITERS INSURANCE COMPANY	
Elisabeth H. Rose ROSE PADDEN & PETTY, L.C. 612 WesBanco Building P.O. Box 1307 Fairmont, WV 26555-1307	M. David Maloney Lee H. Ogburn KRAMON & GRAHAM, P.A. 1 South Street, Suite 2600 Baltimore, MD 21202-3291 <i>Admitted pro hac vice</i>

HUDSON SPECIALTY INSURANCE COMPANY


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BAYER CORPORATION

Arnd N. von Waldow
Wayne Ringelsen
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Reed Smith Centre
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AMERICAN INTERNATIONAL SPECIALTY LINES INSURANCE COMPANY

c/o Chartis Specialty Insurance Company
Corporation Service Company
209 West Washington Street
Charleston, WV 25302



Jeffrey A. Holmstrand (#4893)

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