

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA

ERNIE LEE ANDERSON, *et al.*, )  
 )  
 Plaintiffs, )  
 )  
 v. ) CIVIL ACTION NO. 09-C-220K  
 ) Judge Mark A. Karl  
 )  
 COLUMBIAN CHEMICALS COMPANY, )  
 a foreign corporation, *et al.*, )  
 )  
 Defendants. )  
 \_\_\_\_\_ )  
 )  
 RAIN CII CARBON LLC, )  
 )  
 Defendant/  
 Third-Party Plaintiff, )  
 )  
 v. )  
 )  
 LIBERTY MUTUAL FIRE INSURANCE )  
 COMPANY, *et al.*, )  
 )  
 Third-Party Defendants. )  
 \_\_\_\_\_ )

**VERIFIED STATEMENT OF APPLICATION FOR *PRO HAC VICE***  
**ADMISSION FOR BETH P. EVANS**

STATE OF MARYLAND, TO WIT:

Beth P. Evans, being first duly sworn, deposes and says that the following statements provided in conjunction with her application for *pro hac vice* admission are true and correct, except so far as they are therein stated to be on information, and insofar as they are therein stated to be upon information, she believes them to be true.

1. I am a lawyer employed by the firm of Kramon & Graham, P.A., telephone number (410) 752-6030, and am making this application in compliance with the provisions of

Rule 8.0 of the West Virginia Rules for Admission to the Practice of Law, for admission to practice on behalf of Travelers Property Casualty Company of America, Gulf Underwriters Insurance Company, Travelers Casualty and Surety Company, and The Travelers Indemnity Company, named as third-party defendants in the above styled action.

2. I am an active member in good standing of the Bars of the following courts:

- a. Court of Appeals of Maryland
- b. District of Columbia Court of Appeals
- c. United States Court of Appeals for the Fourth Circuit
- d. United States District Court for the District of Maryland
- e. United States District Court for the District of Columbia

3. The name, address and telephone number of the registration or disciplinary agency of each state court before which I am admitted to practice is:

Attorney Grievance Commission of Maryland  
People's Resource Center, Suite 3301  
100 Community Place  
Crownsville, MD 21032  
(410) 514-7051

4. Jeffery W. Lilly and the law firm of Rose Padden Petty Taylor & Lilly, L.C., attorneys at law, 612 WesBanco Building, Post Office Box 1307, Fairmont, West Virginia, 26554, telephone number (304) 363-4260, are and will be the responsible local attorneys with whom I associate in this matter.

5. I have not been involved in any matter before West Virginia tribunals or bodies in the preceding twenty-four (24) months.

6. Lee H. Ogburn and Stuart M.G. Seraina, principals of this firm, are serving as counsel for defendants Travelers Property Casualty Company of America, Gulf Underwriters Insurance Company, Travelers Casualty and Surety Company, and The Travelers Indemnity Company in the instant case, and in the related cases of Amanda Anderson, et al. v. Columbian Chemicals Company, et. al., Civil Action No. 11-C-153K, and Brian Anderson, et al. v. Rain CII Carbon, LLC, et al., Civil Action No. 11-C-152H, both before this Court, and Lee H. Ogburn has served as counsel for defendant Travelers Casualty and Surety Company in the case of U.S. Silica Company v. ACE Fire Underwriters Insurance Company, et al., Civil Action No. 06-C-2, Circuit Court of Morgan County, West Virginia, 77 Fairfax Street, Room 302, Berkeley Springs, WV 25411, (304) 258-8554.

7. Other than the matters referred to in the preceding paragraph, on information and belief no other lawyer of this firm has been involved in matters before West Virginia tribunals or bodies during the preceding twenty-four (24) months.

8. I am a member in good standing with each Bar to which I have been admitted to practice, and I have not been disciplined by any Bar in any jurisdiction within the preceding twenty-four (24) months or at any other time.

9. As part of this application for admission *pro hac vice*, I agree to comply with all laws, rules and regulations of the West Virginia state and local governments, where applicable, including taxing authorities and any standards for *pro bono* civil and criminal indigent defense legal services.

10. The State of Maryland provides like courtesy and privilege for admission *pro hac vice* to members of the West Virginia State Bar.

Beth P. Evans  
Beth P. Evans

STATE OF MARYLAND,  
COUNTY OF Carroll, TO WIT:

Taken, subscribed and sworn to before me this 26<sup>th</sup> day of February, 2015, by Beth P. Evans.

Stephanie A. Sohn  
Notary Public, State of Maryland

My Commission Expires:  
4/1/15



Endorsed by Responsible Local Attorney:

  
Jeffery W. Lilly

Jeffery W. Lilly  
ROSE PADDEN PETTY TAYLOR & LILLY, L.C.  
Attorneys at Law  
612 WesBanco Building  
Post Office Box 1307  
Fairmont, West Virginia 26555-1307  
(304) 363-4260  
(304) 363-4284 - Facsimile  
[jlilly@rpptl.com](mailto:jlilly@rpptl.com)  
State Bar I.D. No. #8046