

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA
BUSINESS COURT DIVISION

COVESTRO LLC,
Plaintiff

v.

AXIALL CORPORATION,
ALLTRANSTEK, LLC, and
RESCAR COMPANIES,
Defendants

Civil Action No.: 18-C-202
Presiding Judge: Judge Wilkes
Co-Resolution Judges: Judge Carl and
Judge Nines

and

AXIALL CORPORATION,
Third-Party Plaintiff

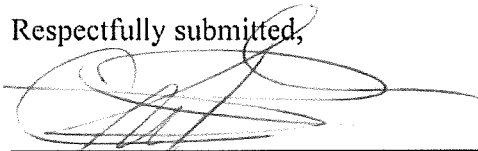
v.

SUPERHEAT FGH SERVICES, INC.,
Third-Party Defendant

STATEMENT OF ENDORSEMENT

Pursuant to Rule 8.0(c) of the Rule for Admission to the Practice of Law in the State of West Virginia, Michael J. Victorson, endorses the Verified Statement of Application for *Pro Hac Vice* Admission by Jayme Butcher and agrees to participate in the referenced case as local counsel.

Respectfully submitted,



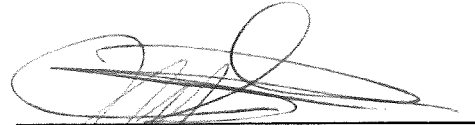
Michael B. Victorson (WVSB #3868)
JACKSON KELLY PLLC
500 Lee Street, Suite 1600
P.O. Box 553
Charleston, WV 25322-0553
T: (304) 340-1079
F: (304) 340-1050
mvictorson@jacksonkelly.com

Counsel for Defendant Covestro LLC

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, TO WIT:

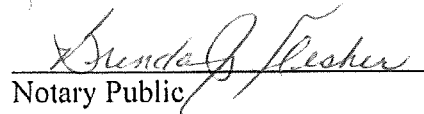
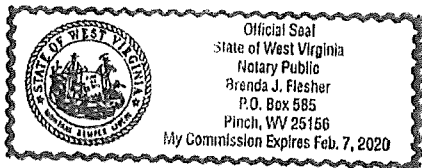
I, Michael B. Victorson, upon first being sworn and upon oath, state that I have appeared as counsel of record for Covestro LLC in the case styled *Covestro LLC v. Axiall Corporation, et al.*, Civil Action No. 18-C-202 and that the matters set forth in this Verified Statement of Application for Admission *Pro Hac Vice* of Jayne Butcher are true and accurate to the best of my knowledge and belief; and that I agree to participate as the local counsel of record as provided for by the Rules of this Honorable Court.



Michael B. Victorson

Taken, subscribed to and sworn before me on this 8th day of August, 2019.

My commission expires: February 7, 2020



Notary Public

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Plaintiff**

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RESCAR COMPANIES,
Defendants**

**Civil Action No.: 18-C-202
Presiding Judge: Judge Wilkes
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and

**AXIALL CORPORATION,
Third-Party Plaintiff**

v.

**SUPERHEAT FGH SERVICES, INC.,
Third-Party Defendant**

MOTION FOR ADMISSION *PRO HAC VICE* OF JAYME L. BUTCHER

Michael B. Victorson, a member in good standing of the West Virginia State Bar and counsel for Plaintiff Covestro LLC ("Covestro") in the above-captioned action, hereby respectfully moves for Jayme L. Butcher to be admitted *pro hac vice* as counsel for Covestro in connection with all legal proceedings to be had before this Court in the above-captioned civil matters. In support of this motion, and pursuant to Rule 8 of the West Virginia Rules for the Admission to the Practice of Law, the movant submits an attached Verified Statement of Application for Admission *Pro Hac Vice* for this respective applicant.

WHEREFORE, this movant respectfully requests this Honorable Court permit applicant Jayme Butcher to appear *pro hac vice* in connection with all legal proceedings to be had before this Court in Civil Action Nos. 18-C-202, in the Circuit Court of Marshall County, West Virginia.

Respectfully submitted,

COVESTRO LLC

by Counsel



Michael B. Victorson (WVSB #3868)
Sarah A. Phipps (WVSB #13031)
JACKSON KELLY PLLC
Post Office Box 553
Charleston, West Virginia 25322-0553
(304) 340-1000

Kevin M. Eddy (WVSB# 12360)
BLANK ROME LLP
501 Grant Street, Suite 850
Pittsburgh, Pennsylvania 15219
(412) 932-2800

IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA
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COVESTRO LLC,
Plaintiff

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AXIALL CORPORATION,
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Defendants

Civil Action No.: 18-C-202
Presiding Judge: Judge Wilkes
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Judge Nines

and

AXIALL CORPORATION,
Third-Party Plaintiff

v.

SUPERHEAT FGH SERVICES, INC.,
Third-Party Defendant

ORDER

Upon consideration of the Motion for Admission *Pro Hac Vice* of Jayme L. Butcher, it is hereby **ORDERED** that said motion be **GRANTED** and that Jayme L. Butler be admitted to appear *pro hac vice* in all legal proceedings to be had before this Court in the above-captioned civil action and here appearance is hereby entered.

Upon entry of this Order, the Clerk is directed to forward a certified copy of this Order to counsel of record.

Entered this ____ day of _____, 2019.

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Plaintiff**

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ALLTRANSTEK, LLC, and
RESCAR COMPANIES,
Defendants**

**Civil Action No.: 18-C-202
Presiding Judge: Judge Wilkes
Co-Resolution Judges: Judge Carl and
Judge Nines**

and

**AXIALL CORPORATION,
Third-Party Plaintiff**

v.

**SUPERHEAT FGH SERVICES, INC.,
Third-Party Defendant**

CERTIFICATE OF SERVICE

I, Michael B. Victorson, counsel for Covestro LLC, certify that on this 7th day of August, 2019, the foregoing **MOTION FOR ADMISSION *PRO HAC VICE* OF JAYME L. BUTCHER and VERIFIED STATEMENT OF APPLICATION FOR ADMISSION *PRO HAC VICE*** were served via United States Mail at the addresses below, by first class mail, posted prepaid, as follows:

Michelle L. Gorman, Esquire
LEWIS, BRISBOIS, BISGAARD & SMITH
3054 Pennsylvania Avenue
Weirton, WV 26062

Thomas Mannion, Esquire
LEWIS, BRISBOIS, BISGAARD & SMITH
1375 East 9th Street, Suite 2250
Cleveland, OH 44114

Christopher Ballod, Esquire
Ashley J. Giannetti, Esquire
LEWIS, BRISBOIS, BISGAARD & SMUITH
429 Fourth Avenue, Suite 805
Pittsburgh, PA 15219

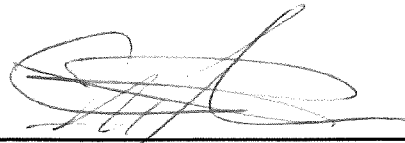
Ryan M. Krescanko, Esquire
Thomas Birris, Esquire
Darren M. Newberry, Esquire
MARSHALL, DENNEHEY, WARNER, COLEMAN & GOGGIN
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Kevin M. Eddy, Esquire
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535 Smithfield Street
Pittsburgh, PA 15222-2315

William D. Wilmoth, Esquire
STEPTOE & JOHNSON, PLLC
P.O. Box 751
Wheeling, WV 26003-0751

Brad Whalen, Esquire
PORTER HEDGES, LLP
1000 Main Street, 36th Floor
Houston, TX 77002



Michael B. Victorson (West Virginia Bar # 3868)

**IN THE CIRCUIT COURT OF MARSHALL COUNTY, WEST VIRGINIA
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COVESTRO, LLC,

Civil Action No. 18-C-202

Plaintiff

v.

Presiding Judge: Judge Wilkes

Co-Resolution Judges: Judges Carl & Nines

AXIALL CORPORATION,
ALLTRANSTEK LLC, and RESCAR, INC.
t/d/b/a RESCAR COMPANIES,

Defendants

AXIALL CORPORATION,

Third-Party Plaintiff

v.

SUPERHEAT FGH SERVICES, INC.,

Third-Party Defendant

AND

AXIALL CORPORATION,

Civil Action No. 18-C-203

Plaintiff

v.

ALLTRANSTEK LLC, RESCAR, INC.
t/d/b/a RESCAR COMPANIES, and
SUPERHEAT FGH SERVICES, INC.,

Defendants

**VERIFIED STATEMENT OF APPLICATION FOR
ADMISSION PRO HAC VICE OF JAYME BUTCHER**

Pursuant to Rule 8 of the West Virginia Rules for Admission to the Practice of Law, Jayme Butcher submits this verified statement of application for admission pro hac vice to the Circuit Court of Marshall County, West Virginia, and in support thereof states as follows:

1. The matters that are the subject of this application are Covestro LLC v. Axiall, et al, Civil Action No. 18-C-202, pending in the Circuit Court of Marshall County, West Virginia and Axiall Corporation v. Alltranstek LLC, et al, Civil Action No. 18-C-203, pending in the Circuit Court of Marshall County, West Virginia.

2. I am admitted to practice law in the Commonwealth of Pennsylvania. My Pennsylvania bar number is 87568. The name, address, and telephone number of the registration agency in Pennsylvania is:

Supreme Court of Pennsylvania
Pennsylvania Judicial Center
601 Commonwealth Avenue, Suite 4500
Harrisburg, PA 17120

3. The responsible local attorney in this matter is Michael B. Victorson, a member of the West Virginia State Bar and a member of the law firm of Jackson Kelly PLLC, 500 Lee Street East, Suite 1600, Charleston, WV 25301. The telephone number of Mr. Victorson is 304.340.1079. Mr. Victorson agrees to participate in this matter as required by Rule 8.0(c), as evidenced by his respective endorsement upon this statement of application.

4. I am, or have been in the preceding twenty-four months, involved in the following matters before West Virginia tribunals or bodies:

Markwest Liberty Midstream & Resources, L.L.C. v. Bilfinger Westcon, Inc., et al.
Circuit Court of Wetzel County, West Virginia
Business Court Division Civil Action No.: 16-C-66


5. Based upon a reasonable inquiry, attorneys at my law firm of Blank Rome LLP, 501 Grant Street, Suite 850, Pittsburgh, Pennsylvania 15219, are, or have been during the preceding twenty-four months, involved in the following matters before West Virginia tribunals or bodies:

See Exhibit 1 hereto

6. I certify that I am a member in good standing with the bar of Pennsylvania. I have never been disciplined in any jurisdiction, including in the preceding twenty-four months.


7. I agree to comply with all laws, rules and regulations of West Virginia state and local governments, where applicable, including taxing authorities and any standards for pro bono civil and criminal indigent defense legal services.

8. A duplicate original of this Verified Statement of Application for Admission Pro Hac Vice has been filed with the West Virginia State Bar along with the fee of three-hundred fifty dollars (\$350.00), as required by Rule 8.0(c) of the West Virginia Rules for Admission to the Practice of Law.



Jayme L. Butcher

Subscribed and sworn to before me
this 23rd day of July, 2019.



Brenda Kruger, Notary Public
My Commission Expires November 30, 2020

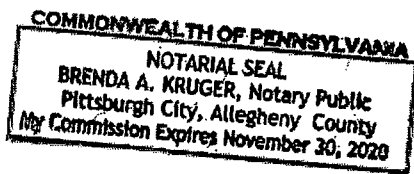


EXHIBIT 1

Attorney	Case Name
Laurence S. Shtasel	<i>Thomas Geishauser v. National Collegiate Athletic Association</i> , Circuit Court of Monongalia County, West Virginia, Civil Action No. 15-C-723
Arthur W. Hankin	<i>Thomas Geishauser v. National Collegiate Athletic Association</i> , Circuit Court of Monongalia County, West Virginia, Civil Action No. 15-C-723
Lewis W. Schlossberg	<i>Thomas Geishauser v. National Collegiate Athletic Association</i> , Circuit Court of Monongalia County, West Virginia, Civil Action No. 15-C-723
Andrew Williamson	<p><i>In Re Philip and Denise Rogers/Rogers v. Selene Finance</i>, U.S Bankruptcy Court for the Southern District of West Virginia, Case No. 10-21060/AP No. 14-2068</p> <p><i>Bank of America, N.A. v. G. Russell Rollyson, Jr. Deputy Commissioner of Delinquent and Nonentered Lands of Harrison County, West Virginia, Harrison County Circuit Court</i>, Case No. 12- C-412-1</p> <p><i>Steven Abrogast, individually and on behalf of a class of similarly situated persons v. Roundpoint Mortgage Servicing, Corp.</i>, Kanawha County Circuit Court, Case No. 15-C-596</p>
Marquel S. Jordan	<p><i>Crystal Good, et al. v American Water Works Company, et al</i>, United States District Court for the Southern District of West Virginia. Civil Action No.: 2:14-CV-01374 (Consolidated with Case No. 2:14-11011; Case No. 2:14-13164; Case No. 2:14-13454)</p> <p><i>Desimone Hospitality Services v. West Virginia American Water Company, et al</i>, United States District Court for the Southern District of West Virginia, Civil Action No. 2:14-14845 (A. P. 2:14- 2036)</p> <p><i>Brian Tucker v Momentive Performance Materials USA Inc., et al</i>, United States District Court for the Southern District of West Virginia, Civil Action No. 2:13-CV-04480.</p>
Robert Scott	<p><i>Crystal Good, et al. v American Water Works Company, et al</i>, United States District Court for the Southern District of West Virginia. Civil Action No.: 2:14-CV-01374 (Consolidated with Case No. 2:14-11011; Case No. 2:14-13164; Case No. 2:14-13454)</p> <p><i>Desimone Hospitality Services v. West Virginia American Water Company, et al</i>, United States District Court for the Southern District of West Virginia, Civil Action No. 2:14-14845 (A. P. 2:14- 2036)</p>

	<i>Brian Tucker v Momentive Performance Materials USA Inc., et al</i> , United States District Court for the Southern District of West Virginia, Civil Action No. 2:13-CV-04480.
Deborah Greenspan	<i>Crystal Good, et al. v American Water Works Company, et al</i> , United States District Court for the Southern District of West Virginia. Civil Action No.: 2:14-CV-01374 (Consolidated with Case No. 2:14-11011; Case No. 2:14-13164 ; Case No. 2:14-13454)
Joseph Moran	<i>Markwest Liberty Midstream & Resources, L.L.C. v. Bilfinger Westcon, Inc., et al.</i> Circuit Court Of Wetzel County, West Virginia Business Court Division Civil Action No.: 16-C-66

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Third-Party Plaintiff

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AND

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Plaintiff

v.

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t/d/b/a RESCAR COMPANIES, and
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Defendants

ORDER

Upon consideration of the Motion of Michael B. Victorson, for the admission of the Applicant, Jayme Butcher to appear *pro hac vice* in all legal proceedings to be had before this Court in the above-captioned civil matters, the motion is hereby **GRANTED**.