

IN THE CIRCUIT COURT OF RALEIGH COUNTY, WEST VIRGINIA

YEAREGO ASSOCIATES, INC.,

Plaintiff,

v.

Civil Action Number: 22-C-156

BAD TIDINGS, LLC,

Defendant.

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 8.0, West Virginia Rules for Admission to the Practice of Law by and through its undersigned attorney, moves this Court for an order allowing Leah-Ann Clay, Esq. to appear in this Court as counsel on behalf of Yearego Associates, Inc. in the above styled lawsuit.

In support of this motion, counsel avers as follows:

1. The matter requires attention for upcoming depositions/hearings that undersigned is unable to attend and this proposed pro hac counsel has been involved in this particular matter during all proceedings and pleadings.

2. It is therefore necessary to have pro hac vice counsel assigned to this matter to give it the attention it deserves and not cause any unnecessary delays in litigation.

3. This Proposed Pro Hac Attorney: Leah-Ann Clay has litigated several cases in the Raleigh County Circuit Court, the West Virginia Mass Litigation Panel and West Virginia Business Court.

4. This motion will not cause any delay in representation from our firm of delay of any kind.

5. Leah-Ann Clay begun employment at Dunlap & Associates prior to the retainment of Yearego Associates and she has assisted in all proceedings conducted in this cause.

6. Leah-Ann Clay is a member in good standing and admitted to practice before all the courts of the State of Florida, including but not limited to the U.S. District Court for the Southern District of Florida as shown on Certificate of Good Standing attached hereto as *Exhibit "A"*.

7. Ms. Clay is familiar with, and will be governed by Local Rules and West Virginia Court of Claims, including Rule 8 thereof. Ms. Clay is familiar with, and will be governed by, the Code of Professional Responsibility and the other ethical limitations or requirements governing the professional behavior of members of The West Virginia Bar.

8. Ms. Clay designates Robert P. Dunlap, II and the law firm of Robert P. Dunlap, Esquire, PLLC, 345 Prince Street, Beckley, West Virginia, 25801, as the lawyer and law firm upon whom all notices and papers may be served and who will be responsible for the progress of the case, including the trial in default of the non-resident attorneys.

9. Through his signature affixed below, Robert P. Dunlap, II, 345 Prince Street, Beckley, West Virginia 25801 hereby consents to such designation.

10. Pursuant to Rule 8.0, West Virginia Rules for Admission to the Practice of Law, Robert P. Dunlap, II certifies that Ms. Clay has complied with the fee and registration requirements of Rule 8.0(c) and Rule 8.0 (e), Local Rules and West Virginia Court of Claims.

11. The Verified Statement of Application of Leah-Ann Clay for Pro Hac Vice Admission to the West Virginia State Bar is attached hereto as *Exhibit "B"*.

WHEREFORE, Petitioner, Yearego Associates, Inc., by and through local counsel, Robert P. Dunlap, II, respectfully request this Court enter an order admitting Leah-Ann Clay to practice before this Court pro hac vice.

YEAREGO ASSOCIATES, INC.,
By Counsel

/s/Robert P. Dunlap
Robert Dunlap II, Esq. (WVSB# 10012)
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CERTIFICATE OF SERVICE

I, Robert P. Dunlap, II, do hereby certify that I have served a true copy of the foregoing **“MOTION FOR ADMISSION PRO HAC VICE”** upon the following, via the WV e-file system, this the 18th day of September, 2023:

**Joseph A. Ford, Esq.
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/s/Robert P. Dunlap

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