

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In re: The Matter of the 2016	:	
Presidential Election	:	Docket No. 659-MD-2016
	:	
	:	ELECTION MATTER

MOTION FOR ADMISSION *PRO HAC VICE*

Lawrence J. Tabas, Esquire, hereby moves that Chad A. Readler be admitted to appear and practice in this Court as counsel for President-Elect Donald J. Trump, Vice-President-Elect Michael Pence, and Donald J. Trump for President, Inc. in the above-captioned matter as counsel *pro hac vice* pursuant to Pa. R.C.P. No. 1012.1

The undersigned counsel, Lawrence J. Tabas, Esquire, is a Partner with the law firm of Obermayer Rebmann Maxwell & Hippel LLP, and is admitted to practice in this Court and therefore makes the instant Motion.

In support of this Motion, undersigned counsel attaches the Verification for Admission *pro hac vice* of Chad A. Readler, filed herewith as Exhibit “A,” which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

The submission of the appropriate form and payment of the required \$375.00 admission fee to the Pennsylvania IOLTA Board has been accomplished on behalf of Chad A. Readler. See certification and acknowledgement attached as Exhibit “B.”

In support of this Motion, undersigned counsel attaches a Verification for Admission *pro hac vice* of Chad A. Readler by Lawrence J. Tabas, filed herewith as Exhibit “C,” which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

Respectfully Submitted:

OBERMAYER REBMANN MAXWELL &
HIPPEL LLP

/s/ *Lawrence J. Tabas*

Lawrence J. Tabas, I.D. No. 27815

OBERMAYER REBMANN MAXWELL &
HIPPEL LLP

Centre Square West

1500 Market Street, Suite 3400

Philadelphia, PA 19102

Phone: 215-665-3158

lawrence.tabas@obermayer.com

EXHIBIT A

See attached.

least ten years. I have never had an application for admission denied. I am requesting *pro hac vice* admission in the Commonwealth Court of Pennsylvania in the following matter: In re: The Matter of the 2016 Presidential Election, Docket No. 659-MD-2016 (the “Case”).

I shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

I shall submit to the jurisdiction of the Pennsylvania Courts and the Pennsylvania Disciplinary Board with respect to acts or omissions occurring during the appearance in the Case.

I consent to the appointment of Lawrence J. Tabas as the agent upon whom service of process shall be made for all actions, including disciplinary actions that may arise out of the practice of law in the Case.

Respectfully Submitted:

/s/ Chad A. Readler

Chad A. Readler

JONES DAY

325 John H. McConnell Blvd., Suite 600

Columbus, OH 43215

Phone: 614-469-3939

careadler@jonesday.com

EXHIBIT B

**CERTIFICATION OF FEE PAYMENT AND REQUIRED INFORMATION TO
PENNSYLVANIA INTEREST ON LAWYERS TRUST ACCOUNT BOARD
(IOLTA BOARD)**

This shall serve as the fee payment certification and required information certification referenced in 204 Pa. Code § 81.503; 231 Pa. Code § 1012.1(b).

I hereby certify that the \$375.00 fee required by 204 Pa. Code § 81.505(a) has been paid in the case of In re: The Matter of the 2016 Presidential Election, Docket No. 659-MD-2016, filed in the Commonwealth Court of Pennsylvania. A copy of the fee payment certification from the IOLTA Board is attached hereto.

I hereby certify that the information required by 204 Pa. Code § 81.504 has been provided to the Pennsylvania IOLTA Board.



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

December 01, 2016

CHAD READLER, Esq.
JONES DAY
325 JOHN H. MCCONNELL BLVD.
SUITE 600
COLUMBUS, OH 43215

SENT TO CHAD READLER VIA Email: erica.woebse@obermayer.com

Dear Attorney READLER:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as In Re: Matter of the 2016 Presidential Election, no. 659 M.D. 2016, filed in the Commonwealth Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart
Executive Director

cc: LAWRENCE TABAS, Esq.

Lawrence.Tabas@obermayer.com

Pennsylvania Judicial Center
601 Commonwealth Ave., Ste. 2400
PO Box 62445, Harrisburg, PA 17106-2445
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX
paiolta@pacourts.us · www.paiolta.org

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program

EXHIBIT C

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In re: The Matter of the 2016 Presidential Election :
: Docket No. 659-MD-2016
:
: ELECTION MATTER

VERIFICATION

I, Lawrence J. Tabas, Esquire, certify and affirm that after reasonable investigation, I reasonably believe that Chad A. Readler, Esquire is a reputable and competent attorney, and I am in a position to recommend this candidate for *pro hac vice* admission for practice in the Commonwealth Court of Pennsylvania.

I am also a sponsor of candidate David M. Morrell, Esquire, for admission *pro hac vice* in the Commonwealth Court of Pennsylvania, and a Motion for Admission *Pro Hac Vice* is currently pending on his behalf.

If applicable at the conclusion of this matter, I affirm that the proceeds from any settlement related to this cause of action in which Chad A. Readler, Esquire is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including IOLTA provisions thereof.

Respectfully Submitted:

/s/ Lawrence J. Tabas
Lawrence J. Tabas, I.D. No. 27815
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HIPPEL LLP
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1500 Market Street, Suite 3400
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