



IN THE COURT OF COMMON PLEAS OF CENTRE COUNTY, PENNSYLVANIA
CIVIL ACTION

GRAHAM B. SPANIER,
Plaintiff

vs.

THE PENNSYLVANIA STATE
UNIVERSITY,
Defendant

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:
:
:
:

No. 2016-0571

TYPE OF MATTER:
Civil

TYPE OF PLEADING:
Motion for Admission Pro Hac Vice -
Thomas A. Clare

FILED ON BEHALF OF:
Graham B. Spanier

COUNSEL FOR PARTY:
Kathleen V. Yurchak, Esquire
STEINBACHER, GOODALL & YURCHAK
Pa.I.D. 55948
328 South Atherton Street
State College, PA 16801
(814) 237-4100
(814) 237-1497 (fax)
yurchak@centrelaw.com

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CENTRE COUNTY
PROthon
OFFICE OF THE
CLERK OF COURT
JAN 10 PM 2:07

Thomas A. Clare, Esq.
Elizabeth M. Locke, Esq.
Andrew C. Phillips, Esq.
CLARE LOCKE LLP
902 Prince Street
Alexandria, VA 22314

**IN THE COURT OF COMMON PLEAS OF
CENTRE COUNTY, PENNSYLVANIA
CIVIL ACTION—LAW**

GRAHAM B. SPANIER,

Plaintiff,

v.

THE PENNSYLVANIA STATE
UNIVERSITY,

Defendant.

:
: Docket No. 2016-0571
:
: Type of Case: Breach of
: Contract
:
: Type of Pleading: Motion for
: Admission Pro Hac Vice
:
: Filed on Behalf of: Plaintiff
:
: Counsel of Record: Kathleen
: Yurchak, P.A.I.D. 55948
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MOTION FOR ADMISSION *PRO HAC VICE*

Kathleen Yurchak, Esquire, hereby moves that Thomas A. Clare be admitted to appear and practice in this Court as counsel for Plaintiff Graham B. Spanier in the above-captioned matter, as counsel *pro hac vice* pursuant to Pa. R.C.P. 1012.1.

The undersigned counsel, Kathleen Yurchak, Esquire, is a Partner with the law firm of Steinbacher, Goodall & Yurchak, P.C., 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 Thomas A. Clare, 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 admission fee to the Pennsylvania IOLTA Board has been accomplished on behalf of Thomas A. Clare. A confirmation of payment is attached as Exhibit "B."

In support of this Motion, undersigned counsel also submits a Verification for Admission *pro hac vice* of Thomas A. Clare, filed herewith as Exhibit "C," which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

Respectfully submitted,

Steinbacher, Goodall & Yurchak, P.C.

Dated: May 18, 2016

By: 

Kathleen Yurchak, Esq.

(PA I.D. 55948)

328 South Atherton Street

State College, PA 16801

Telephone: (814) 237-4100

Fax: (814) 237-1497

yurchak@centrelaw.com

EXHIBIT A

**IN THE COURT OF COMMON PLEAS OF
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GRAHAM B. SPANIER,

Plaintiff,

v.

THE PENNSYLVANIA STATE
UNIVERSITY,

Defendant.

:
: Docket No. 2016-0571
:
: Type of Case: Breach of
: Contract
:
: Type of Pleading: Verification to
: Motion for Admission Pro Hac
: Vice
:
: Filed on Behalf of: Plaintiff
:
: Counsel of Record: Kathleen
: Yurchak, PA I.D. 55948

VERIFICATION

I, Thomas A. Clare, am a member in good standing of the bars of the following jurisdictions and courts:

Jurisdiction	Year Admitted	Bar No.
Commonwealth of Virginia	10/11/95	39299
District of Columbia	2/1/99	461964
U.S. Court of Appeals, 4th Circuit	11/1/96	n/a
U.S. District Court, Eastern District of Virginia	8/8/97	39299
U.S. District Court, Western District of Virginia	6/2/05	39299
U.S. District Court, District of Maryland	2/16/99	n/a
U.S. District Court, District of Columbia	2/5/07	461964
U.S. District Court, District Court of Colorado	5/11/04	n/a
U.S. Court of Appeals, 7th Circuit	2/5/05	n/a

I do not currently have, nor have I ever had, any disciplinary proceedings pending against me in any Federal or State Court, nor have I ever been reprimanded, suspended, or disbarred from the practice of law. I have no pending disciplinary complaints as to which a finding has been made that the complaint should proceed to hearing.

I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice when facing a disciplinary complaint before this court or any other court.

I have applied for *pro hac vice* admission in the following cases in Pennsylvania state court: *Weckerly v. Nationwide Mutual Fire Insurance Company*, Case No. 2766; *Delvalle v. Nationwide Mutual Fire Insurance Company*, Case No. 2368; *Johnson v. Nationwide Mutual Fire Insurance Company*, Case No. 0656; *Stephen A. Burch v. Comcast Corporation Et Al.*, Case No. 001895; *Graham B. Spanier v. Louis J. Freeh and Freeh Sporkin & Sullivan, LLP*, Case No. 2013-2707; *GGNSC Clarion LP, d/b/a "Golden Living Center – Clarion," et al. v. Kathleen G. Kane, in her Official Capacity as Attorney General of the Commonwealth of Pennsylvania; and Cohen Milstein Sellers & Toll, PLLC*, Case No. 165 MD 2015.

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 Cases.

I consent to the appointment of Kathleen Yurchak, Steinbacher, Goodall & Yurchak, P.C., 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 Cases.

Respectfully submitted,

Dated: May 16, 2016

By: Thomas A. Clare
Thomas A. Clare (V.A. Bar. 39299)
CLARE LOCKE LLP
902 Prince Street
Alexandria, Virginia 22314
Telephone: (202) 628-7400

A hand-drawn, irregular oval shape with a black outline, centered on the page. The text "EXHIBIT B" is written inside the oval in a bold, black, sans-serif font.

EXHIBIT B



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

Your application for *pro hac vice* admission has been submitted!

Applicant for *pro hac vice* admission: THOMAS A. CLARE

Contact Person: THOMAS A. CLARE

Delivery Method Selected: EMAIL

TOM@CLARELOCKE.COM

Pennsylvania Attorney of Record: KATHLEEN VERONICA YURCHAK

Delivery Method Selected: EMAIL

YURCHAK@CENTRELAW.COM

Total: \$375.00

(Fee is calculated \$375.00 per attorney, per case.)

Please mail this voucher with your check, money order or cashier's check for the full amount noted above made payable to **Pennsylvania IOLTA Board**.

The application(s) will not be processed until your payment has been received by the Pennsylvania IOLTA Board.

Submission Date and Time: 5/12/2016 4:58:43 PM

OSID: VA39299

If using Federal Express or another courier service, please use our physical address:

Supreme Court of Pennsylvania
PA IOLTA Board
601 Commonwealth Ave, Suite 2400
Harrisburg, PA 17120

This voucher is designed to fit into a standard #10 window envelope when folded on the dotted lines.

Supreme Court of Pennsylvania
PA IOLTA Board
P.O. Box 62445
Harrisburg, PA 17106-2445

PENNSYLVANIA IOLTA BOARD
Form for PRO HAC VICE ADMISSION

(For all nonresident attorneys requesting permission to participate in proceedings in a Pennsylvania Court)

Note: This document is only for your own reference. Please do not mail this form in.

Applicant Name: CLARE THOMAS A.
Last First Middle
Date of Birth: 10/23/1970

Your Firm's Name & Mailing Address:

CLARE LOCKE LLP
Firm Name
902 PRINCE STREET
Address 1 Address 2 Address 3
ALEXANDRIA VA 22314
City State Zip
UNITED STATES OF AMERICA (202) 628-7400 7401 (999) 999-9999
Country Office Phone Office Fax

Your Firm's Physical Address:

902 PRINCE STREET
Address 1 Address 2 Address 3
ALEXANDRIA VA 22314 UNITED STATES OF AMERICA
City State Zip Country

Acknowledgement Letter should be provided to:

THOMAS A. CLARE TOM@CLARELOCKE.COM E-MAIL
Contact Name Contact Fax Contact Email Delivery Preference

Name & Office Address of Attorney of Record in the Pennsylvania Proceeding who is filing the Motion for your admission Pro Hac Vice:

55948 KATHLEEN VERONICA YURCHAK STEINBACHER, GOODALL & YURCHAK
PA I.D. Number Name Firm Name
328 S ATHERTON ST
Address 1 Address 2 Address 3
STATE COLLEGE PA 16801-4043
City State Zip
(814) 237-4100 (814) 237-1497 YURCHAK@CENTRELAW.COM E-MAIL
Office Phone Office Fax Contact Email Delivery Preference

Case Information:

Case Number	Case Name	Term	PA Court	Location	District Court
2016-0571	GRAHAM B. SPANIER V. PENNSYLVANIA STATE UNIVERSITY		COURT OF COMMON PLEAS	CENTRE	

Primary Jurisdiction:

Jurisdiction: VA

Year of Licensure: 1995

License Number: 39299

Other Jurisdictions:

Jurisdiction	Year	License Number
DISTRICT OF COLUMBIA	1999	461964

Are you familiar with the Pennsylvania Rules of Professional Conduct, Pennsylvania Rules of Disciplinary Enforcement, and the rules and court procedures of the court before which you seek to appear, and will you at all times abide by and comply with the same so long as such Pennsylvania proceeding is pending and you have not withdrawn as counsel therein?

Yes No

My client is proceeding in forma pauperis:

Yes No

I certify that the information provided on this form is true. If any statements are false, I realize I am subject to discipline by the Supreme Court of Pennsylvania. I hereby certify that I am enclosing the fee required by Rule 301 of the Pennsylvania Bar Admission Rules. I hereby agree that any action brought against me by the Supreme Court of Pennsylvania or any of its boards or instrumentalities may be brought in the Court of Common Pleas of Allegheny, Dauphin or Philadelphia County, Pennsylvania.

Signature: THOMAS A. CLARE

Date of Application: 05/12/2016



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

May 13, 2016

THOMAS A. CLARE, Esq.
CLARE LOCKE LLP
902 PRINCE STREET
ALEXANDRIA, VA 22314

SENT TO THOMAS A. CLARE VIA Email: TOM@CLARELOCKE.COM

Dear Attorney CLARE:

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 Check on this date related to your pursuit for admission *pro hac vice* in the case identified as Graham B. Spanier v. Pennsylvania State University, no. 2016-0571, filed in Court of Common Pleas of Centre County.

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 cursive script that reads "Stephanie S. Libhart".

Stephanie S. Libhart
Executive Director

cc: KATHLEEN VERONICA YURCHAK, Esq.
yurchak@centrelaw.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

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: Filed on Behalf of: Plaintiff
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: Counsel of Record: Kathleen
: Yurchak, P.A.I.D. 55948

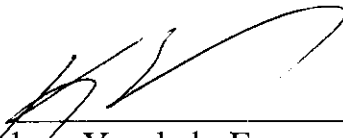
VERIFICATION

I, Kathleen Yurchak, Esquire certify and affirm that after reasonable investigation, I reasonably believe that Thomas A. Clare, 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 Court of Common Pleas.

I am currently a sponsor for Thomas A. Clare, Andrew C. Phillips, and Elizabeth M. Locke in the Commonwealth of Pennsylvania for admission *pro hac vice* in the matter *Graham B. Spanier v. Louis J. Freeh and Freeh Sporkin & Sullivan, LLP*, Case No. 2013-2707. Simultaneously with the filing of the instant Motion, I am also sponsoring motions for admission *pro hac vice* for Andrew C. Phillips and Elizabeth M. Locke in the same matter.

If applicable at the conclusion of this matter, I affirm that the proceeds from any settlement related to this cause of action in which Thomas A. Clare 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.

Dated: May 18, 2016

By: 
Kathleen Yurchak, Esq.
(PA 55948)

CERTIFICATE OF SERVICE

I, Kathleen Yurchak, of the law firm Steinbacher, Goodall & Yurchak, P.C., certify that I will cause a Notice of Filing of the Foregoing Motion for Admission *Pro Hac Vice* to be served on counsel, and that I on May 18, 2016, served the foregoing Motion for Admission *Pro Hac Vice* by electronic mail and first-class mail on the counsel listed below:

Daniel I. Booker (Pa. 10319)
Donna M. Doiblick (Pa. 75394)
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(814) 355-4769 (phone)
(814) 355-5024 (facsimile)

jgreen@lmgrlaw.com

Attorneys for Defendant The Pennsylvania State University

Steinbacher, Goodall & Yurchak, P.C.

Dated: May 18, 2016

By: 

Kathleen Yurchak, Esq.

(PA 55948)

328 South Atherton Street

State College, PA 16801

Telephone: (814) 237-4100

Fax: (814) 237-1497

yurchak@centrelaw.com