

COPY

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

GRAHAM B. SPANIER,  
Plaintiff

vs.

LOUIS J. FREEH and FREEH  
SPORKIN & SULLIVAN, LLP  
Defendants

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No. 2013-2707

FILED FOR RECORD  
2015 MAR 16 PM 2:36  
DEBRA C. JIMBLE  
PROTHONOTARY  
CENTRE COUNTY, PA

TYPE OF MATTER:  
Defamation

TYPE OF PLEADING:  
Motion for Admission Pro Hac Vic

FILED ON BEHALF OF:  
Graham B. Spanier

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

Elizabeth K. Ainslie, Esquire  
Pa.I.D. 35870  
SCHNADER HARRISON SEGAL & LEWIS  
1600 Market Street, Suite 3600  
Philadelphia, PA 19103  
215-751-2000/215-751-2205 (fax)

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**

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GRAHAM B. SPANIER,

Plaintiff,

v.

LOUIS J. FREEH and  
FREEH SPORKIN & SULLIVAN,  
LLP,

Defendants.

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: Docket No. 2013-2707  
:  
: Type of Case: Defamation  
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: Type of Pleading: Motion for  
: Admission Pro Hac Vice  
:  
: Filed on Behalf of: Plaintiff  
:  
: Counsel of Record: Kathleen  
: Yurchak, PA I.D. 55948  
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DEBRA C. HAMEL  
PROTINOTARY  
CENTRE COUNTY, PA  
2015 MAR 16 PM 2:31  
FILED FOR RECORD  
COPY

**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 Goodall & Yurchak, P.C., and is admitted to practice in this Court and therefore makes the instant Motion.

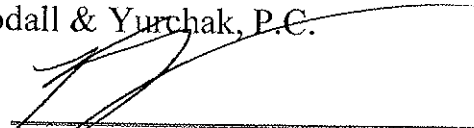
In support of this Motion, undersigned counsel attaches the Verification for Admission *pro hac vice* of Thomas A. Clare, filed herewith as Exhibit "A," which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

The submission of the appropriate form and payment of the required \$200 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,

Goodall & Yurchak, P.C.

By:   
Kathleen Yurchak, Esq.  
(PA I.D. 55948)  
328 South Atherton Street  
State College, PA 16801  
Telephone: (814) 237-4100  
Fax: (814) 237-1497

Dated: March 16, 2015

**CERTIFICATE OF SERVICE**

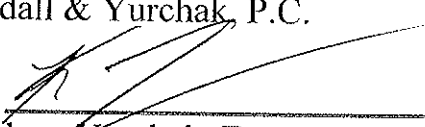
I, Kathleen Yurchak, of the law firm Goodall & Yurchak, P.C., certify that I will cause a Notice of Filing of the Foregoing Motion for Admission *Pro Hac Vice* to be served on counsel, and that I on March 11, 2015, served the foregoing Motion for Admission *Pro Hac Vice* by electronic mail and first-class mail on the counsel listed below:

Lisa M. Welsh (Pa. 307382)  
MILLER, KISTLER & CAMPBELL  
720 South Atherton Street, Suite 201  
State College, PA 16801-4669  
(814) 234-1500 (phone)  
(814) 234-1549 (facsimile)

Robert C. Heim (Pa. 15758)  
Michael L. Kichline (Pa. 62293)  
Asha T. Mehrotra (Pa. 315176)  
William T. McEnroe (Pa. 308821)  
DECHERT LLP  
Cira Centre  
Philadelphia, PA 19104-2808  
(215) 994-4000 (phone)  
(215) 994-2222 (facsimile)

Goodall & Yurchak, P.C.

Dated: March 11, 2015

By:   
Kathleen Yurchak, Esq.  
(PA 55948)  
328 South Atherton Street  
State College, PA 16801  
Telephone: (814) 237-4100  
Fax: (814) 237-1497

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

GRAHAM B. SPANIER,	:	
	:	Docket No. 2013-2707
Plaintiff,	:	
v.	:	Type of Case: Defamation
	:	
LOUIS J. FREEH and	:	Type of Pleading: Verification to
FREEH SPORKIN & SULLIVAN,	:	Motion for Admission Pro Hac
LLP,	:	Vice
	:	
Defendants.	:	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	n/a
U.S. District Court, District of Maryland	2/16/99	n/a
U.S. District Court, District of Columbia	2/5/07	n/a
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. I am requesting *pro hac vice* admission in the Court of Common Pleas in the following matter: *Graham B. Spanier v. Louis J. Freeh and Freeh Sporkin & Sullivan, LLP*, Case No. 2013-2707.

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, 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: March 16, 2015

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





SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

March 13, 2015

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

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

Dear Attorney THOMAS:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$200.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as Spanier v. Freeh, et al, no. 2014-2707, 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, reading "Stephanie S. Libhart".

Stephanie S. Libhart  
Executive Director

cc: KATHLEEN VERONICA YURCHAK, Esq.  
(814) 237-1497

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

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GRAHAM B. SPANIER,

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: Hac Vice  
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: Counsel of Record: Kathleen  
: Yurchak, PA I.D. 55948  
:  
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**VERIFICATION**

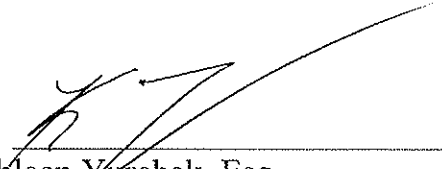
I, Kathleen Yurchak, Esquire certify and affirm that after reasonable investigation, I reasonably believe that Thomas A. Clare, Esquire is a reputable and competent attorney, and I am in a position to recommend this candidate for *pro hac vice* admission for practice in the Court of Common Pleas.

I am not currently a sponsor of any other attorneys in any other court of the Commonwealth of Pennsylvania for any candidates for admission *pro hac vice*. Simultaneously with the filing of the instant Motion, I am also sponsoring motions for admission *pro hac vice* for two other attorneys 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: March 16, 2015

By:   
Kathleen Yurchak, Esq.  
(PA I.D.:55948)