

IN THE SUPREME COURT OF OHIO

QUICKEN LOANS, LLC and  
MORTGAGE ELECTRONIC  
REGISTRATION SYSTEMS, INC.,  
Appellants,  
v.  
SAMUEL VOSS,  
Appellee.

: Case No. 2024-0257  
:  
: On appeal from the Hamilton County Court  
: of Appeals  
: First Appellate District,  
:  
: Court of Appeals Case No. C 2300065  
:  
:  
:

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**MOTION TO APPEAR PRO HAC VICE OF WILLIAM M. JAY**

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William M. Jay (OH PHV# 26577)  
*Pro hac vice admission forthcoming*  
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*Counsel for Appellants*  
*Quicken Loans, LLC and Mortgage Electronic Registration Systems, Inc.*

Pursuant to Gov.Bar R. XII and S.Ct.Prac.R. 2.02, attorney William M. Jay of Goodwin Procter LLP, and counsel for Appellants Quicken Loans, LLC and Mortgage Electronic Registration Systems, Inc., moves this Court for permission to appear pro hac vice and participate as co-counsel for Appellants Quicken Loans, LLC and Mortgage Electronic Registration Systems, Inc.

Mr. Jay’s residential and law firm/employer addresses are as follows:

Residential:

438 Summers Dr.  
Alexandria, VA 22301

Law firm/employer:

Goodwin Procter LLP  
1900 N Street, NW  
Washington, DC 20036

The following is a list of the jurisdictions in which Mr. Jay has been licensed to practice law, including dates of admission, resignation, or retirement, and registration numbers if applicable:

<b>Jurisdiction</b>	<b>Date of Admission</b>	<b>Registration Number</b>
District of Columbia Bar/D.C. Court of Appeals	12/2/2002	480185
Virginia State Bar/Supreme Court of Virginia	5/6/2002	46997
U.S. Supreme Court	6/6/2005	
U.S. Court of Appeals, First Circuit	4/18/2006	111872
U.S. Court of Appeals, Second Circuit	1/17/2013	
U.S. Court of Appeals, Third Circuit	5/21/2014	
U.S. Court of Appeals, Fourth Circuit	8/22/2006	
U.S. Court of Appeals, Fifth Circuit	2/20/2015	
U.S. Court of Appeals, Sixth Circuit	8/9/2007	
U.S. Court of Appeals, Seventh Circuit	4/22/2011	

U.S. Court of Appeals, Eighth Circuit	1/28/2013	
U.S. Court of Appeals, Ninth Circuit	5/16/2002	
U.S. Court of Appeals, Tenth Circuit	3/9/2020	
U.S. Court of Appeals, Eleventh Circuit	5/1/2013	
U.S. Court of Appeals, Federal Circuit	6/5/2013	
U.S. Court of Appeals, District of Columbia Circuit	2/27/2004	
U.S. District Court for the District of Colorado	9/19/2013	
U.S. District Court for the District of Columbia	5/5/2003	480185
U.S. District Court for the Northern District of Illinois	1/5/2024	
U.S. Court of International Trade	4/12/2017	

Mr. Jay satisfies the requirements in Section 2(A)(1) and (2) of Gov.Bar R. XII. First, Mr. Jay neither resides in nor is regularly employed at an office in this state. Second, Mr. Jay has not taken and failed the Ohio bar examination, been denied admission without examination, or had an application for admission in this state denied on character and fitness grounds pursuant to Gov. Bar R. I within the last five years.

Mr. Jay has also never been disbarred, is not currently under suspension, and has never resigned with discipline pending in any jurisdiction in which he's been admitted. Mr. Jay also affirms that he will comply with the applicable statutes, law and procedural rules of this state and the rules, policies, and procedures of this Court, and will be familiar with and comply with the Ohio Rules of Professional Conduct and the Rules for the Government of the Bar.

Mr. Jay further represents that he has not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Section 2(A)(6) of Gov. Bar. R. XII.

Matthew C. Blickensderfer is licensed to practice law in Ohio, bar number 0073019, is an attorney at Frost Brown Todd LLP, and as an active attorney in good standing, has agreed to associate with Mr. Jay on this case.

The affidavit required by Gov. Bar R. XII(2)(A)(7)(c) and S.Ct.Prac.R. 2.02(B)(1), and the Certificate of Pro Hac Vice Registration are attached as *Exhibits A and B*, respectively.

Mr. Jay understands that, if this motion is granted, he must file a *Notice of Permission to Appear Pro Hac Vice* and a copy of the order granting permission to appear, with the Office of Bar Admissions within 30 days of the order.

Mr. Jay thus requests that this Court grant him permission to appear pro hac vice in this proceeding.

Respectfully submitted,

/s/ Matthew C. Blickensderfer  
Matthew C. Blickensderfer (0073019)  
*Counsel of Record*  
FROST BROWN TODD LLP  
3300 Great American Tower  
301 East Fourth Street  
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*Counsel for Appellants*  
*Quicken Loans, LLC and Mortgage*  
*Electronic Registration Systems, Inc.*

**CERTIFICATE OF SERVICE**

A copy of the foregoing *Motion to Appear Pro Hac Vice* was served this 23rd day of February 2024, via email, upon the following:

W. B. Markovits, Esq.  
Terence R. Coates, Esq.  
Justin C. Walker, Esq.  
Dylan J. Gould, Esq.  
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Matthew C. Metzger, Esq.  
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*Counsel for Appellee Samuel Voss*

*/s/ Matthew C. Blickensderfer*

# **EXHIBIT A**

IN THE SUPREME COURT OF OHIO

QUICKEN LOANS, LLC and	:	Case No. 2024-0257
MORTGAGE ELECTRONIC	:	
REGISTRATION SYSTEMS, INC.,	:	On appeal from the Hamilton County Court
	:	of Appeals
Appellants,	:	First Appellate District,
	:	
v.	:	Court of Appeals Case No. C 2300065
	:	
SAMUEL VOSS,	:	
	:	
Appellee.	:	

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**AFFIDAVIT OF WILLIAM M. JAY**

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DISTRICT OF COLUMBIA §

William M. Jay, being duly sworn in accordance with law, states as follows:

1. I am over 18 years old, of sound mind, and otherwise competent to make this affidavit. I have personal knowledge of the facts set forth herein.
2. I am an attorney at Goodwin Procter LLP, and I am counsel for Appellants Quicken Loans, LLC and Mortgage Electronic Registration Systems, Inc., in the above-captioned case.
3. I am submitting this affidavit in support of my *Motion to Appear Pro Hac Vice*.
4. I neither reside in, nor am regularly employed at, an office in Ohio.
5. I passed the bar examination in the Commonwealth of Virginia, I am admitted to the practice of law in the District of Columbia and the Commonwealth of Virginia, and I am in good standing in each of these jurisdictions.

6. I have never taken and failed the Ohio bar examination, been denied admission without examination, or had an application for admission in this state denied on character and fitness grounds pursuant to Gov. Bar R. I within the last five years.

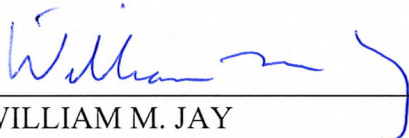
7. I have never been disbarred, am not currently under suspension from the practice of law in any jurisdiction, have no disciplinary actions or contempt proceedings pending against me before any court or administrative body, and have never resigned with discipline pending in any jurisdiction in which I've been admitted.

8. I will comply with the applicable statutes, law and procedural rules of this state and the rules, policies, and procedures of this Court, and am familiar and will comply with the Ohio Rules of Professional Conduct and the Rules for the Government of the Bar.

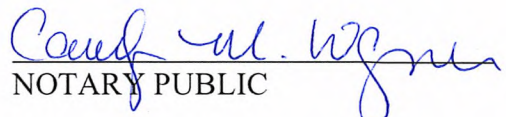
9. I have not been granted permission to appear pro hac vice in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Section 2(A)(6) of Gov. Bar. R. XII.

FURTHER AFFIANT SAYETH NAUGHT.



  
WILLIAM M. JAY

Sworn to before me and in my presence this 22 day of FEBRUARY, 2023. 2024

  
NOTARY PUBLIC

# **EXHIBIT B**

# THE SUPREME COURT *of* OHIO

Office of Bar Admissions

IN THE MATTER OF THE APPLICATION OF

**William Jay**

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

**William Jay**

\_\_\_\_\_, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Certificate of  
PRO HAC VICE  
REGISTRATION

2024

Registration Number:  
PHV- 26577-2024

Issued by the Office of Bar Admissions.

**Expires December 31, 2024**