

Shannon Anderson
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Attorney for Sierra Club

**BEFORE THE ENVIRONMENTAL QUALITY COUNCIL
STATE OF WYOMING**

IN THE MATTER OF:) Docket No. 09-2801
MEDICINE BOW FUEL & POWER, LLC)
AIR PERMIT CT-5873)

MOTION FOR ADMISSION *PRO HAC VICE*

COMES NOW, Shannon Anderson, Attorney for Sierra Club, hereby moves that the Council accept, pursuant to Wyo. Stat. § 33-5-111, Rule 11 of the Rules Providing for the Organization and Government of the Bar Association and Attorneys at Law of the State of Wyoming, and Rule 104 of the Uniform Rules for the District Courts of the State of Wyoming, the Admission *Pro Hac Vice* of Daniel Galpern and David Bahr, Western Environmental Law Center, 1216 Lincoln Street, Eugene, OR 97401, for the purpose of representing Sierra Club in this matter.


As grounds and reasons for said motion, the Movant states:

1. Movant, Shannon Anderson, is a current licensed member of the Wyoming State Bar in good standing.
2. Movant vouches for the good moral character and veracity of Daniel Galpern and David Bahr, the attorneys who seek admission *Pro Hac Vice*.

3. Daniel Galpern has been a member in good standing of the bar of the state of Oregon since 2006, and is admitted to practice in all state trial and appellate courts in the state of Oregon.
4. David Bahr has been a member in good standing of the bar of the state of Oregon since 1990, and is admitted to practice in all state trial and appellate courts in the state of Oregon.
5. Mr. Galpern and Mr. Bahr have associated with the Movant for the purpose of acting as local counsel on behalf of Sierra Club in the above-captioned case.
6. The Movant will remain fully prepared to represent Sierra Club at any time and in any capacity and will participate completely.
7. Mr. Galpern and Mr. Bahr have received a Certificate of Compliance with Rule 11 of the Rules Providing for the Organization and Government of the Bar Association and Attorneys at Law of the State of Wyoming from the Wyoming State Bar. The Certificates of Compliance are filed with this motion.
8. The movant has filed with the Environmental Quality Council an Entry of Appearance on behalf of Sierra Club in the above-captioned case.

WHEREFORE, the undersigned counsel respectfully requests that the Environmental Quality Council enter an order admitting Daniel Galpern and David Bahr Pro *Hac* Vice for the purposes of representing Sierra Club in the above-captioned matter and for further and other relief as the Council may deem just and proper in the premises.

DATED: This 18th Day of September 2009


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CERTIFICATE OF SERVICE

I, Shannon Anderson, hereby certify that on this 18th day of September 2009 a true and correct copy of the foregoing **MOTION FOR ADMISSION *PRO HAC VICE*** was served by United States mail and electronic mail to:

Dennis M. Boal, Chairman
Environmental Quality Council
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