

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 )

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**MOTION FOR ADMISSION *PRO HAC VICE***

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COMES NOW, Shannon Anderson, Attorney for Sierra Club, and hereby moves the Council for an order, pursuant to Wyo. Stat. 33-5-1 11 and U.R.D.C. 104, for the Admission *Pro Hac Vice* of Andrea Issod, Sierra Club Law Program, 85 2nd St. 2nd Floor, San Francisco, CA 94105, 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 Andrea Issod, the attorney who seeks admission *Pro Hac Vice*.
3. Andrea Issod has been a member in good standing of the bar of the state of California since June 1, 2004, and is admitted to practice in all state trial and appellate courts in the state of California.
4. Ms. Issod has associated with the Movant for the purpose of acting as local counsel on behalf of Sierra Club in the above-captioned case.

5. Ms. Issod has been serving as a staff representative for Sierra Club in this matter prior to this point. Since Sierra Club now has outside counsel, Ms. Issod seeks to be admitted *Pro Hac Vice* so she can continue representing Sierra Club in this matter.
6. The Movant will remain fully prepared to represent Sierra Club at any time and in any capacity and will participate completely.
7. Ms. Issod has 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 Certificate of Compliance is included with this motion.

WHEREFORE, the undersigned counsel respectfully requests that the Environmental Quality Council enter an order admitting Andrea Issod *Pro Hac Vice* for the purposes of representing Sierra Club in the above-captioned matter.

DATED: This 16<sup>th</sup> Day of November 2009

Sierra Club

By: 

Shannon Anderson (6-4402)  
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**CERTIFICATE OF SERVICE**

I, Shannon Anderson, hereby certify that on this 16th day of November 2009 a true and correct copy of the foregoing **MOTION FOR ADMISSION PRO HAC VICE** was served by electronic mail to:

Dennis M. Boal, Chairman  
Environmental Quality Council  
122 West 25th Street  
Herschler Building, Room 1714  
Cheyenne, WY 82002  
Email c/o Jim Ruby, Executive Secretary,  
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Email c/o Kim Waring, Executive Assistant,  
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A handwritten signature in black ink, appearing to read "Shannon Anderson", with a long horizontal line extending to the right.

Shannon Anderson (6-4402)  
Attorney for Sierra Club