

**IN THE CHANCERY COURT FOR THE TWENTITH JUDICIAL DISTRICT
DAVIDSON COUNTY, TENNESSEE**

PUBLIC.RESOURCE.ORG and)
DAVID L. HUDSON JR.,)
)
Petitioners,)
)
v.)
)
MATTHEW BENDER AND)
COMPANY, INC., a division of)
LexisNexis Group,)
)
Respondents.)

Case No. 22-1025-III

MOTION TO APPEAR PRO HAC VICE

The undersigned, pursuant to Tennessee Supreme Court Rule 19(d), hereby moves for permission to appear *pro hac vice* on behalf of [Proposed] Intervenor Respondent, the Tennessee Code Commission, in the above-captioned docket. In support of this motion, movant respectfully shows unto the Court, as follows:

1. Mr. Kreutz is a licensed attorney in the State of California, is a member of the Bar of California in good standing and is authorized to practice before the California Supreme Court.
2. Mr. Kreutz is in good standing in all jurisdictions and courts where Mr. Kreutz is authorized or has been permitted to practice law.
3. Mr. Kreutz is employed by the Office of the Tennessee Attorney General and serves in the Financial Division. He has been assigned to represent the interests of the [Proposed] Intervenor Respondent in the above captioned proceeding.
4. Pursuant to Tenn. Sup. Ct. R. 7, Section 10.07, Mr. Kreutz is registered and permitted to practice law in the state of Tennessee while his application to practice law in

Tennessee is pending.

5. Pursuant to Tenn. Sup. Ct. R. 19(g), Mr. Kreutz is associated in this proceeding with James P. Urban, Deputy Attorney General of the Financial Division within the Office of Tennessee Attorney General. Mr. Urban is licensed to practice law in Tennessee, and he is in good standing and admitted to practice law before the Supreme Court of Tennessee.

6. Pursuant to Tenn. Sup. Ct. R. 19(f), Mr. Kreutz has filed with the Board of Professional Responsibility of the Supreme Court of Tennessee a copy of this motion along with the supporting documentation and has previously paid the annual fee required in connection with his admission *pro hac vice*.

7. Attached to this motion is Mr. Kreutz's affidavit containing the information required by Tenn. Sup. Ct. R. 19(d). Also attached is a copy of a certificate of good standing from the Supreme Court of California.

WHEREFORE, the undersigned moves the Court to permit Mr. Kreutz's appearance on behalf of the [Proposed] Intervenor Respondent in the above-captioned proceeding.

This _12th_ day of August, 2022.

Respectfully submitted,

/s/ Kevin M. Kreutz

KEVIN M. KREUTZ (No. PHV87125)

Practice Pending Admission

Pro Hac Vice No. PHV87125

/s/ James P. Urban

JAMES P. URBAN (No. 33599)

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Appear *Pro Hac Vice* was served via U.S. Mail and/or electronic transmission upon:

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Counsel for Respondents

On this the 12th day of August 2022.

/s/ Janet M. Kleinfelter
JANET M. KLEINFELTER
Deputy Attorney General