

**IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE  
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY, PART III**

|                                     |   |                      |
|-------------------------------------|---|----------------------|
| PUBLIC.RESOURCE.ORG and             | ) |                      |
| DAVID L. HUDSON, JR.,               | ) |                      |
|                                     | ) |                      |
| Petitioners,                        | ) |                      |
|                                     | ) |                      |
| v.                                  | ) | Case No. 22-1025-III |
|                                     | ) |                      |
| MATTHEW BENDER & COMPANY, INC.,     | ) |                      |
| a division of the LexisNexis Group, | ) |                      |
|                                     | ) |                      |
| Respondent.                         | ) |                      |

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**MOTION FOR ADMISSION PRO HAC VICE OF JOHN M. BOWLER**

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Pursuant to Rule 19 of the Tennessee Supreme Court Rules and the Local Rules, Respondent Matthew Bender & Company, Inc., a division of the LexisNexis, respectfully requests that John M. Bowler of the law firm of Troutman Pepper Hamilton Sanders LLP, be admitted *pro hac vice* to practice before this Court in this present action. Mr. Bowler's office address is 600 Peachtree Street, N.E., Suite 3000, Atlanta, Georgia 30308. Mr. Bowler's phone number is 404-885-3190. Mr. Bowler is a member in good standing with the Supreme Court of Georgia.

In support of this motion, attached hereto as **Exhibit A** is the Affidavit of John M. Bowler. Accordingly, it is requested that John M. Bowler be admitted to practice in this case as counsel for Respondent.

Respectfully submitted,

*/s/ Thomas H. Lee*

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Thomas H. Lee, BPR #17453  
FROST BROWN TODD LLC  
150 3rd Avenue South, Suite 1900  
Nashville, TN 37201  
615-251-5581 Telephone  
615-251-5551 Facsimile  
tlee@fbtlaw.com

*Attorneys for Respondent  
Matthew Bender & Company, Inc., a  
division of the LexisNexis Group*

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing was served upon the following by electronic mail and/or first-class U.S. mail, postage prepaid on this the 12th day of August 2022:

Lucian T. Pera  
ADAMS AND REESE LLP  
6075 Poplar Avenue, Suite 700  
Memphis TN 38119

Joshua Counts Cumby  
ADAMS AND REESE LLP  
1600 West End Avenue, Suite 1400  
Nashville, TN 37203

*Attorneys for Petitioner*

*/s/ Thomas H. Lee*

Copy to:

Board of Professional Responsibility  
10 Cadillac Drive, Suite 220  
Brentwood, Tennessee 37027

IN THE CHANCERY COURT FOR THE STATE OF TENNESSEE  
TWENTIETH JUDICIAL DISTRICT, DAVIDSON COUNTY, PART III

PUBLIC.RESOURCE.ORG and )  
DAVID L. HUDSON, JR., )  
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Petitioners, )  
 )  
v. ) Case No. 22-1025-III  
 )  
MATTHEW BENDER & COMPANY, INC., )  
a division of the LexisNexis Group, )  
 )  
Respondent. )

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**AFFIDAVIT OF JOHN M. BOWLER**

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1. My name is John M. Bowler.
2. I am a lawyer at the law firm of Troutman Pepper Hamilton Sanders LLP.
3. My Georgia State Bar Number is 071770.
4. My home address is 2634 Dunhaven Court, Snellville, GA 30078.
5. My office address is 600 Peachtree Street, N.E., Suite 3000, Atlanta, Georgia 30308.
6. My telephone number is 404-885-3190.
7. My email address is john.bowler@troutman.com.
8. I seek permission to appear *pro hac vice* before this Court to represent Matthew Bender & Company, Inc., a division of the LexisNexis Group in the above-styled action.
9. I am currently licensed in good standing and admitted to practice before the following courts:
  - a. Supreme Court of the United States, admitted May 13, 2019;
  - b. Supreme Court of Georgia, admitted October 14, 1998;

- c. Georgia State and Superior Courts, admitted June 13, 1996;
- d. U.S. Court of Appeals, Federal Circuit, admitted May 17, 2001;
- e. U.S. Court of Appeals, Eleventh Circuit, admitted April 17, 2014;
- f. U.S. District Court, Middle District of Georgia, admitted February 24, 1998;
- g. U.S. District Court, Northern District of Georgia, admitted August 19, 1996;
- h. U.S. District Court, Southern District of Georgia, admitted June 16, 2021; and
- i. U.S. District Court, Northern District of Illinois, admitted November 14, 1991.

I am not licensed to practice before any other State or Federal Court not herein identified.

10. I have never been denied admission *pro hac vice* or had such admission *pro hac vice* revoked by any court in any jurisdiction.

11. I have never been disciplined or sanctioned by the Board of Professional Responsibility of the Tennessee Supreme Court or by any similar disciplinary agency in any jurisdiction, including any United States District Court.

12. No disciplinary action or investigation is pending into my conduct as a lawyer in any jurisdiction or before any court in which I am licensed to practice.

13. I am familiar with the Tennessee Rules of Professional Conduct and the Rules governing the proceedings of this Court.

14. I agree that if I am admitted *pro hac vice* in the above-captioned matter, I will subject myself to the jurisdiction of the courts of Tennessee in any and all matters arising out of my conduct in the above-captioned proceedings. I further agree to be bound by the Tennessee Code of Professional Responsibility as interpreted by Tennessee courts.

15. I am associated in this matter with Thomas H. Lee, an attorney at Frost Brown Todd LLC, 150 3<sup>rd</sup> Avenue South, Suite 1900, Nashville, Tennessee 37201. Mr. Lee's Tennessee bar


number is BPR #17453. Mr. Lee's telephone number is 615-251-5581 and his email address is tlee@fbtlaw.com.

16. I have previously paid all fees required by Rule 19 of the Tennessee Supreme Court in connection with this Motion for Admission.

17. I have served my Motion to appear *pro hac vice* upon all counsel of record in this proceeding and upon the Tennessee Board of Professional Responsibility of the Supreme Court of Tennessee.


18. Certificates of Good Standing from Supreme Court of Georgia are attached to this Affidavit and incorporated herein.

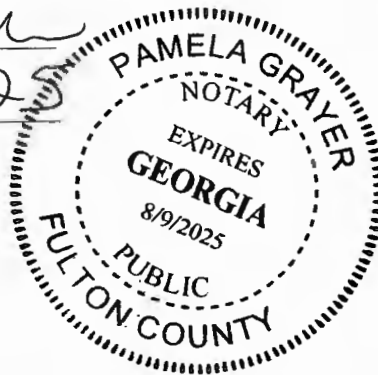
19. I declare under penalty of perjury that the foregoing is true and correct.

  
John M. Bowler

STATE OF GEORGIA            )  
  )ss:  
COUNTY OF FULTON        )

SWORN TO and SUBSCRIBED before me by John M. Bowler, this 10<sup>th</sup> day of August 2022.

  
NOTARY PUBLIC  
My commission expires: 8/9/2025





Supreme Court  
State of Georgia

NATHAN DEAL JUDICIAL CENTER

Atlanta 30334

August 9, 2022

I hereby certify that John Maurice Bowler, Esq., was admitted on the 14<sup>th</sup> day of October, 1998, as a member of the bar of the Supreme Court of Georgia, the highest court of this State; and, since that date he has been and is now a member of this bar in good standing, as appears from the records and files in this office.

Witness my signature and the seal of this Court  
hereto affixed the day and year first above written.



*Theresa S. Bann*, Clerk

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| a division of the LexisNexis Group, | ) |                      |
|                                     | ) |                      |
| Respondent.                         | ) |                      |

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**ORDER GRANTING MOTION FOR ADMISSION  
PRO HAC VICE OF JOHN M. BOWLER**

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A motion has been filed on behalf of John M. Bowler pursuant to Rule 19 of the Tennessee Supreme Court Rules and the Local Rules, seeking *pro hac vice* admission in order to represent Respondent Matthew Bender & Company, Inc., a division of the LexisNexis Group, in this Court. The Court having reviewed the motion and there being no objections by the parties and it appearing that John M. Bowler has satisfied the requirements of Rule 19 of the Tennessee Supreme Court Rules and the Local Rules, the motion for *pro hac vice* admission is hereby GRANTED.

It is so ORDERED this \_\_\_\_ day of August 2022.

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CHANCELLOR ELLEN HOBBS LYLE



Order submitted by,

/s/ Thomas H. Lee

Thomas H. Lee, BPR #17453

FROST BROWN TODD LLC

150 3rd Avenue South, Suite 1900

Nashville, TN 37201

615-251-5581 Telephone

615-251-5551 Facsimile

tlee@fbtlaw.com

*Attorneys for Respondent*

*Matthew Bender & Company, Inc., a division of the LexisNexis Group*

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*Attorneys for Petitioner*

*/s/ Thomas H. Lee*

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