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Attorneys for Plaintiff
MERVY LLOYD MONGAYA

FILED

DEC 18 2017

ASST. CLERK OF COURTS
REPUBLIC OF THE MARSHALL ISLANDS

IN THE SUPREME COURT

OF THE

REPUBLIC OF THE MARSHALL ISLANDS

MERVY LLOYD MONGAYA, Plaintiff, v. AET MCV BETA LLC, AET INC., LTD and AET SHIPMANAGEMENT PTE LTD Defendants.	H.Ct. Civil No. 2017 - 044 **PLAINTIFF'S MOTION TO ADMIT KENNY HOOKS AND RICHARD JERRY DODSON PRO HAC VICE; DECLARATION OF KENNY HOOKS; EXHIBIT A; DECLARATION OF RICHARD JERRY DODSON; EXHIBIT B; PROPOSED ORDER; CERTIFICATE OF SERVICE**

MOTION TO ADMIT KENNY HOOKS AND RICHARD JERRY DODSON PRO HAC VICE

In accordance with Rule 2(b)(iii) of the Republic of the Marshall Islands Rules for Admission to and for the Practice of Law, the undersigned representing Plaintiff in this action respectfully moves for the admission *pro hac vice* of Richard Jerry Dodson and Kenny Hooks of the law, Dodson & Hooks APLC, 112 Founders Drive, Baton Rouge, LA 70810,

http://www.dodsonhooks.com, for purposes of appearance as co-counsel on behalf of Plaintiff in the above-styled case in association with the undersigned and Melvin Narruhn. Both Mr. Hooks and Mr. Dodson are practicing attorneys licensed and admitted to practice law and in good standing in the State of Louisiana. Plaintiff retained Mr. Hooks and his partner Mr. Dodson at the outset of this case to represent his interests. They have been in continuous communication with Plaintiff since the accident and know well the facts of the case and medical condition of the Plaintiff. Mr. Hooks' credentials are set forth in his declaration along with his certificates of good standing in all of these courts attached hereto as **Exhibit A**. Mr. Dodson's credentials are set forth in his declaration along with his certificates of good standing in all of these courts attached hereto as **Exhibit B**.

Because of their vast experience in maritime personal injury law and with this case in particular, it would serve the interests of justice for both counsel to continue to pursue this case on behalf of Plaintiff as co-counsel with Melvin Narruhn and the undersigned, who will at all times participate in a meaningful way in the preparation and trial of this case.

This motion originally was filed in the High Court but the High Court declined to rule on it stating that it was a matter for the Supreme Court since a Notice of Appeal was on file. See **Exhibit C**. However, no Supreme Court number has been assigned in this case, no record has been certified and the time for filing appellate briefs has not begun yet. In any event, Plaintiff respectfully requests the Supreme Court to grant the motion.

Tatyana Cerullo

Tatyana Cerullo
Melvin Narruhn
Attorneys for Plaintiff
MERVY LLOYD MONGAYA

FILED

DEC 13 2017

ASST. CLERK OF COURTS
REPUBLIC OF THE MARSHALL ISLANDS

IN THE HIGH COURT
OF THE
REPUBLIC OF THE MARSHALL ISLANDS

MERVY LLOYD MONGAYA, Plaintiff, v. AET MCV BETA LLC, AET INC., LTD, and AET SHIPMANAGEMENT PTE LTD, Defendants.	CIVIL ACTION 2017-044 **ORDER DECLINING TO RULE ON PLAINTIFFS' MOTION TO ADMIT KENNETH HOOKS AND RICHARD DODSON *PRO HAC VICE***

Tatyana Cerullo, counsel for plaintiff
Melvin Narruhn, counsel for plaintiff
Dennis Reeder, counsel for defendants
Nenad Krek, counsel for defendants

I have received and reviewed plaintiffs' motion to admit Messrs. Hooks and Dodson *pro hac vice*. I decline to rule on the motion because I question whether the High Court has jurisdiction in light of the notice of appeal filed September 11, 2017. I could direct plaintiffs' counsel to brief that jurisdictional issue, but I will be leaving the Republic for an extended vacation in just a few days, and it is unlikely that I would be able to reconsider the motion and issue a ruling before I return in January 2018.

BASED ON THE FOREGOING, IT IS HEREBY ORDERED AS FOLLOWS:

1. Plaintiffs' counsel shall file the motion in the RMI Supreme Court, where jurisdiction exists and where the motion can be resolved without undue delay.

DATED this 13th day of December, 2017.

BY THE COURT:

COLIN R. WINCHESTER
Associate Justice

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Attorney for Plaintiff
MERVY LLOYD MONGAYA

IN THE SUPREME COURT

OF THE

REPUBLIC OF THE MARSHALL ISLANDS

MERVY LLOYD MONGAYA, Plaintiff, v. AET MCV BETA LLC, AET INC LTD and AET SHIPMANAGEMENT PTE LTD Defendants.	H.Ct. Civil No. 2017-044 **CERTIFICATE OF SERVICE**

I hereby certify that on December 15, 2017 a true and correct copy of the PLAINTIFF'S MOTION TO ADMIT KENNY HOOKS AND RICHARD JERRY DODSON PRO HAC VICE was served upon the following by email attachment in PDF format to:

Dennis J. Reeder, Nenad Krek
Attorney for Plaintiffs
dreeder.rmi@gmail.com
nkrek@amkhawaii.com

Tatyana Cerullo

Tatyana Cerullo

EXHIBIT A

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Attorneys for Plaintiff
MERVY LLOYD MONGAYA

IN THE HIGH COURT

OF THE

REPUBLIC OF THE MARSHALL ISLANDS

MERVY LLOYD MONGAYA, Plaintiff, v. AET MCV BETA LLC, AET INC., LTD and AET SHIPMANAGEMENT PTE LTD Defendants.	H.Ct. Civil No. 2017 - 044 **DECLARATION OF KENNETH H. HOOKS, III**

DECLARATION OF KENNETH H. HOOKS, III

I, Kenneth H. Hooks, III, a principal attorney at Dodson & Hooks LLC, 112 Founders Drive, Baton Rouge, LA 70810, do declare that:

1. I respectfully request that the courts of the Republic of the Marshall Islands admit me pursuant to Rule 2(b)(iii) for Admission Pro Hac Vice, Rule 2(b)(iii) of the Republic of the Marshall Islands Rules for Admission to and for the Practice of Law of the Republic of the

Marshall Islands in the above caption cases.

2. I am a member in good standing of the Bar of the State of Louisiana, United States of America.

3. I was admitted to practice law in the following:

   - The United States Supreme Court in 1997;
   - The United States Court of Appeals for the Fifth Circuit in 2002;
   - United States Western District Court of Louisiana in 1997;
   - United States Middle District Court of Louisiana in 1997;
   - United States Eastern District Court of Louisiana in 1998; and
   - Louisiana State and Federal Courts in 1997.

4. I am a member in good standing before these courts. See **Exhibit A-1** setting forth certificates of good standing before all of these courts.

5. I graduated from Southeastern Louisiana University, Hammond, Louisiana with a B.S. in 1997, and Louisiana State University Law Center, Baton Rouge, Louisiana with a J.D. in 1997.

6. I have represented clients in maritime personal injury matters since 1997.

7. I have held a position as Professor at the Southern University Law School, Baton Rouge, LA, since 2007, where I teach Offshore Personal Injury and Admiralty law.

8. I am a member of the Baton Rouge Bar Association, Louisiana State Bar Association, American Bar Association, and Louisiana Association for Justice.

9. I have taught International Admiralty and Maritime Personal Injury at the Tulane Summer School Program in Greece.

10. Plaintiff retained me and my partner Richard J. Dodson at the outset of this case, and we have been in continuous communication with Plaintiff since the accident. I know well the facts of the case and medical condition of the Plaintiff.

11. Because of my vast experience in maritime personal injury law and with this case in particular, it would serve the interests of justice for me to pursue this case on behalf of Plaintiff.

12. I have associated myself with Tatyana Cerullo and Melvin Narruhn, who are licensed to practice law in the Marshall Islands and who are representing Plaintiff in this case. I am working closely with local counsel, and if admitted, intend to participate in the remainder of this case.

13. I make this declaration under penalty of perjury.

Dated: 23rd June 2017

Kenneth H. Hooks, III

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

CERTIFICATE OF GOOD STANDING

I, William W. Blevins, Clerk of this Court,

certify that Kenneth H. Hooks III, Bar # 25097,

was duly admitted to practice in this Court on 03/25/1998, and is in good standing as a member

of the Bar of this Court.

Dated at New Orleans, LA (*Location*) on 06/05/2017 (*Date*)

William W. Blevins
CLERK

DEPUTY CLERK

United States of America

State of Louisiana

Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

KENNETH HENRY HOOKS, III ESQ., #25097

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 10th Day of October, 1997 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign my name and affix the seal of this Court, at the City of New Orleans, this the 30th Day of May, 2017, A.D.

Clerk of Court
Supreme Court of Louisiana

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

CERTIFICATE OF GOOD STANDING

I, Michael L. McConnell, Clerk of the United States District Court for the Middle District of Louisiana, do hereby certify that

Kenneth H. Hooks, III

was duly admitted to practice in this Court on December 9, 1997 and is in good standing as a member of the Bar of this Court.

As of this date no disciplinary actions have been filed in this Court.

Dated at Baton Rouge, Louisiana on June 8, 2017

Michael L. McConnell
Clerk, United States District Court
for the Middle District of Louisiana

UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

CERTIFICATE OF GOOD STANDING

I, LYLE W. CAYCE, Clerk of this Court, certify that **Kenneth Henry Hooks, III** was duly admitted to practice in this Court on November 13, 1997, and is in good standing in this Court.

Dated at NEW ORLEANS, LOUISIANA on June 30, 2017

Lyle W. Cayce

LYLE W. CAYCE
Clerk

By: _____
Margaret H. Dufour
Deputy Clerk

A True Copy
Certified order issued Jun 30, 2017

Lyle W. Cayce
Clerk, U.S. Court of Appeals, Fifth Circuit

Supreme Court of the United States
OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

KENNETH H. HOOKS, III
OF BATON ROUGE, LA

was duly admitted and qualified as an Attorney and Counselor for the Supreme Court of the United States on the seventh day of October, in the year two thousand and two, and is now a member of the Bar of this Court in good standing.

In testimony, whereof, as Clerk of said Court, I have hereunto set my hand and affixed the seal of said Court, at the City of Washington, this sixteenth day of June 2017.

Scott S. Harris
Clerk of the Supreme Court
of the United States

By Shareem Hill-Raymond

Shareem Hill-Raymond

Assistant Admissions Officer

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

CERTIFICATE OF GOOD STANDING
and
STATEMENT OF DISCIPLINE

I, Tony R. Moore, Clerk of the United States District Court, Western District of Louisiana, DO HEREBY CERTIFY THAT

KENNETH H. HOOKS III

was duly admitted to practice in said Court on November 12, 1997 and is in good standing in said Court. There have been no disciplinary actions nor are there any pending disciplinary actions with this Court.

THUS DONE AND SIGNED at Lafayette, Louisiana, on June 14, 2017.

TONY R. MOORE
CLERK OF COURT

By: _____
Deputy Clerk

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Attorneys for Plaintiff
MERVY LLOYD MONGAYA

IN THE HIGH COURT

OF THE

REPUBLIC OF THE MARSHALL ISLANDS

MERVY LLOYD MONGAYA, Plaintiff, v. AET MCV BETA LLC, AET INC., LTD and AET SHIPMANAGEMENT PTE LTD Defendants.	H.Ct. Civil No. 2017 - 044 **DECLARATION OF RICHARD JERALD DODSON**

DECLARATION OF RICHARD JERARLD DODSON

I, Richard Jerald Dodson, a principal attorney at Dodson & Hooks LLC, 112 Founders Drive, Baton Rouge, LA 70810, do declare that:

1. I respectfully request that the courts of the Republic of the Marshall Islands admit me pursuant to Rule 2(b)(iii) for Admission Pro Hac Vice, Rule 2(b)(iii) of the Republic of

the Marshall Islands Rules for Admission to and for the Practice of Law of the Republic of the Marshall Islands in the above caption cases.

2. I am a member in good standing of the Bar of the State of Louisiana, United States of America.
3. I was admitted to practice law in the State of Louisiana, U.S. District Court Eastern District of Louisiana and U.S. District Court Middle District of Louisiana in 1966.
4. I was admitted to the U.S. Court of Appeals 5th Circuit and U.S. Tax Court in 1968.
5. I was admitted to the U.S. Supreme Court in 1971.
6. I am a member in good standing before these courts. See **Exhibit A-1** setting forth certificates of good standing before all of these courts.
7. I graduated from Louisiana State University, Baton Rouge, Louisiana with a B.A. in 1964, and Louisiana State University Law Center, Baton Rouge, Louisiana with a J.D. in 1966.
8. I have represented clients in maritime personal injury matters since 1966.
9. I have held a position as Adjunct Professor at the Southern University Law School, Baton Rouge, LA, since 1967, where I taught maritime personal injury law.
10. I am a member of the Baton Rouge Bar Association, Louisiana State Bar Association, American Bar Association, and Louisiana Association for Justice.
11. I taught International Admiralty for 3 years and Maritime Personal Injury at the Tulane Summer School Program in Greece and was the 2010-2011 president of the Louisiana Association for Justice (LAJ). The LAJ is comprised of plaintiff and defense attorneys from throughout Louisiana who advocate for workplace justice and fairness in the courts

and who work to uphold the honor and dignity of the civil justice system and legal profession in Louisiana.

12. Plaintiff retained me and my partner Kenneth H. Hooks at the outset of this case, and we have been in continuous communication with Plaintiff since the accident. I know well the facts of the case and medical condition of the Plaintiff.

13. Because of my vast experience in maritime personal injury law and with this case in particular, it would serve the interests of justice for me to pursue this case on behalf of Plaintiff.

14. I have associated myself with Tatyana Cerullo and Melvin Narruhn, who are licensed to practice law in the Marshall Islands and who are representing Plaintiff in this case. I am working closely with local counsel, and if admitted, intend to participate in the remainder of this case.

15. I make this declaration under penalty of perjury.

Dated: 17 July ~~June~~ 2017

Richard J. Dodson

UNITED STATES DISTRICT COURT

for the

Eastern District of Louisiana

CERTIFICATE OF GOOD STANDING

I, William W. Blevins, Clerk of this Court,

certify that Richard J. Dodson, Bar # 4982,

was duly admitted to practice in this Court on 09/16/1966, and is in good standing as a member

of the Bar of this Court.

Dated at New Orleans, LA (*Location*) on 06/05/2017 (*Date*)

William W. Blevins
CLERK

DEPUTY CLERK

United States of America

State of Louisiana

Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

RICHARD JERALD DODSON ESQ., #4982

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 31st Day of August, 1966 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign my name and affix the seal of this Court, at the City of New Orleans, this the 30th Day of May, 2017, A.D.

Clerk of Court
Supreme Court of Louisiana

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

CERTIFICATE OF GOOD STANDING

I, Michael L. McConnell, Clerk of the United States District Court for the Middle District of Louisiana, do hereby certify that

Richard J. Dodson

was duly admitted to practice in this Court on September 16, 1966 and is in good standing as a member of the Bar of this Court.

As of this date no disciplinary actions have been filed in this Court.

Dated at Baton Rouge, Louisiana on June 29, 2017

Michael L. McConnell
Clerk, United States District Court
for the Middle District of Louisiana

UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

CERTIFICATE OF GOOD STANDING

I, LYLE W. CAYCE, Clerk of this Court, certify that **Richard Jerald Dodson,** was duly admitted to practice in this Court on October 1, 1981, and is in good standing in this Court.

Dated at NEW ORLEANS, LOUISIANA on July 7, 2017.

Lyle W. Cayce

LYLE W. CAYCE
Clerk

By: Saundra Fairchild

Saundra R. Fairchild
Deputy Clerk

A True Copy
Certified Jul 07, 2017

Lyle W. Cayce

Clerk, U.S. Court of Appeals, Fifth Circuit

Supreme Court of the United States
OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

RICHARD JERALD DODSON
OF BATON ROUGE, LA

was duly admitted and qualified as an Attorney and Counselor for the Supreme Court of the United States on the twenty-ninth day of March, in the year one thousand nine hundred and seventy-one, and is now a member of the Bar of this Court in good standing.

In testimony, whereof, as Clerk of said Court, I have hereunto set my hand and affixed the seal of said Court, at the City of Washington, this twenty-first day of June 2017.

Scott S. Harris
Clerk of the Supreme Court
of the United States

By Shareem Hill-Raymond
Shareem Hill-Raymond

Assistant Admissions Officer

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

CERTIFICATE OF GOOD STANDING
and
STATEMENT OF DISCIPLINE

I, Tony R. Moore, Clerk of the United States District Court, Western District of Louisiana, DO HEREBY CERTIFY THAT

RICHARD J. DODSON

was duly admitted to practice in said Court on December 28, 1992 and is in good standing in said Court. There have been no disciplinary actions nor are there any pending disciplinary actions with this Court.

THUS DONE AND SIGNED at Lafayette, Louisiana, on June 14, 2017.

TONY R. MOORE
CLERK OF COURT

By: _____
Deputy Clerk

IN THE SUPREME COURT

OF THE

REPUBLIC OF THE MARSHALL ISLANDS

MERVY LLOYD MONGAYA, Plaintiff, v. AET MCV BETA LLC, AET INC., LTD and AET SHIPMANAGEMENT PTE LTD Defendants.	H.Ct. Civil No. 2017 - 044 **ORDER GRANTING PLAINTIFF'S MOTION TO ADMIT KENNY HOOKS AND RICHARD JERRY DODSON *PRO HAC VICE***

TO: Tatyana Cerullo, counsel for plaintiff
Melvin Narruhn, counsel for plaintiff
Richard Jerry Dodson and Kenny Hooks, counsel for plaintiff
Dennis Reeder and Nenad Krek, counsel for defendant

Having considered the Plaintiff's Motion to Admit Kenny Hooks and Richard Jerry Dodson *Pro Hac Vice*, the Court orders that Kenny Hooks and Richard Jerry Dodson are admitted, pursuant to Rule 2(b)(III), Admissions Pro Hac Vice, of the Republic of the Marshall Islands Rules for Admission to and for the Practice of Law before the Court of the Republic of the Marshall Islands, to practice *pro hac vice* as co-counsel for the plaintiff with Tatyana Cerullo and Melvin Narruhn in the above-captioned matter.

Entered: December ____, 2017.