

COPY

IN THE TWENTY-SIXTH JUDICIAL DISTRICT
DISTRICT COURT, STEVENS COUNTY, KANSAS
CIVIL DEPARTMENT

FILED

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JOHN STEPHEN ALFORD and ROBERT
LARRABEE, individually and on behalf of
Plaintiff Class as more fully described in the
First Amended Petition,

Plaintiffs,

v.

PIONEER NATURAL RESOURCES USA,
INC.

Defendant

Case No. 93 CV 37

ADAM H. BOECKABEL
CLERK OF DISTRICT COURT
STEVENS CO. KS

MOTION FOR ADMISSIONS *PRO HAC VICE*

Jim H. Goering, of Foulston Siefkin LLP, on behalf of Defendant Pioneer Natural Resources USA, Inc., moves the Court to admit Guy Stanford Lipe and Andrew McCollam III of Vinson & Elkins LLP as attorneys *pro hac vice*.¹ Jim Goering offers the following statements in support of the Motion:²

1. Guy Stanford Lipe and Andrew McCollam III practice law in Texas and are in good standing with the State's highest court.
2. Guy Stanford Lipe and Andrew McCollam III have not been denied admission or disciplined by this court or any other court.
3. Guy Stanford Lipe and Andrew McCollam III are associated with Jim H. Goering of Foulston Siefkin LLP, who is a Kansas resident. Mr. Goering practices law in Kansas and is in good standing with the State's highest court.

WHEREFORE, Jim H. Goering respectfully requests that this Motion for Admission *Pro Hac Vice* be granted and that the Court allow Guy Stanford Lipe and Andrew McCollam

¹ Supreme Court Rule 116.

² Exhibits A and B (Affidavits of Guy Stanford Lipe and Andrew McCollam III in support of the statements).

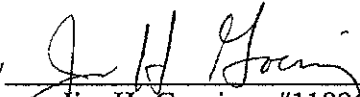
III of Vinson & Elkins LLP to appear on behalf of defendant Pioneer Natural Resources USA, Inc. in Kansas for this action only along with any further relief deemed necessary.

DATED: September 27, 2006

Respectfully submitted.

FOULSTON SIEFKIN LLP
1551 N. Waterfront Parkway, Suite 100
Wichita, KS 67206-4466
316.267.6371

By



Jim H. Goering, #11806

ATTORNEYS FOR DEFENDANT

PIONEER NATURAL RESOURCES USA, INC.

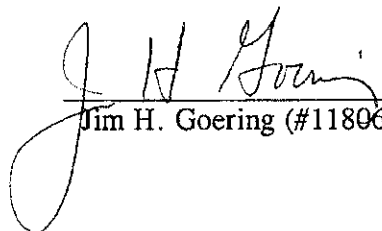
CERTIFICATE OF SERVICE

I certify that a copy of this **Motion for Admission *Pro Hac Vice*** was mailed, postage prepaid, and properly addressed to counsel of record as follows:

Thomas D. Kitch
Gregory J. Stucky
David G. Seely
Fleeson, Goings, Coulson & Kitch, L.L.C.
125 North Market, Suite 1600
Wichita, Kansas 67202

Erick E. Nordling
Kramer, Nordling & Nordling, L.L.C.
209 East Sixth Street
Hugoton, Kansas 67951

on this 27th day of September, 2006.



Jim H. Goering (#11806)

IN THE TWENTY-SIXTH JUDICIAL DISTRICT
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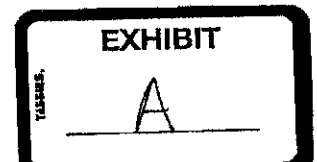
PIONEER NATURAL RESOURCES USA,
INC.

Defendant

AFFIDAVIT OF GUY STANFORD LIPE

Pursuant to Kansas Supreme Court Rule 116, I declare that the following facts are true,
to the best of my knowledge, information and belief:

1. Attorney Name: My full name is Guy Stanford Lipe.
2. Firm Name and Information: I practice under the firm name of Vinson & Elkins LLP, First City Tower, 1001 Fannin Street, Suite 2300, Houston, Texas 77002; phone 713.758.1109. My residence address is 8219 Turnmill Ct., Spring, Texas 77002.
3. Admission Before Other Courts: I am a member in good standing of the bar of the state of Texas. I was admitted in 1983. My Texas State Bar number is 12394600.
4. Agreement to Comply with Rule 116: I have reviewed the Supreme Court Rule 116 regarding admission of attorneys not admitted to practice law in the State of Kansas, but who are regularly engaged in the practice of law in another state. Pursuant to that rule, I have retained local counsel to assist in the representation of this case and I agreed that local counsel will "be actively engaged in the conduct of the matter or litigation, shall sign all pleadings, documents and briefs and shall be present throughout all court or administrative appearances."



5. Consent to Disciplinary Jurisdiction: I consent to the exercise of disciplinary jurisdiction over any alleged misconduct that occurs during the process of this case.
6. In Good Standing: I am in good standing in all bars of which I am a member.
7. No Previous Disciplinary or Grievance Proceedings: No disciplinary or grievance proceedings have been previously filed against me.
8. No Current Disciplinary or Grievance Proceedings: No disciplinary or grievance proceedings are pending against me.
9. No Felony or Unprofessional Conduct. I have not been charged in any court of the United States or of any state, territory, or possession of the United States with the commission of a felony or unprofessional conduct.

Respectfully submitted,



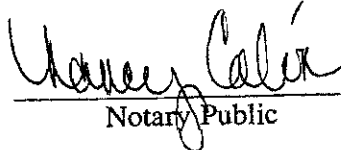
Guy Stanford Lipe

STATE OF TEXAS)
) ss.
COUNTY OF HARRIS)

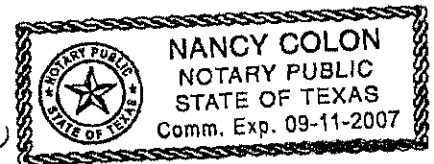
Subscribed and sworn to before me this 30th day of August, 2006 by Guy Stanford Lipe.

My Commission expires:

9-11-2007



Notary Public



IN THE TWENTY-SIXTH JUDICIAL DISTRICT
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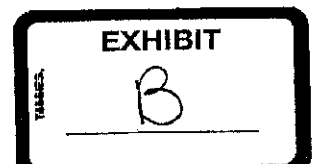
PIONEER NATURAL RESOURCES USA,
INC.

Defendant

AFFIDAVIT OF ANDREW McCOLLAM III

Pursuant to Kansas Supreme Court Rule 116, I declare that the following facts are true,
to the best of my knowledge, information and belief:

1. Attorney Name: My full name is Andrew McCollam III.
2. Firm Name and Information: I practice under the firm name of Vinson & Elkins LLP, First City Tower, 1001 Fannin Street, Suite 2300, Houston, Texas 77002; phone 713.758.1004. My residence address is 6420 Westchester, Houston, Texas 77005.
3. Admission Before Other Courts: I am a member in good standing of the bars of the states of Texas and Louisiana. I was admitted to the bar of the state of Texas in 1990. My Texas State Bar number is 13431812. I was admitted to the bar of the state of Louisiana in 1983. My Louisiana State Bar number is 001929.
4. Agreement to Comply with Rule 116: I have reviewed the Supreme Court Rule 116 regarding admission of attorneys not admitted to practice law in the State of Kansas, but who are regularly engaged in the practice of law in another state. Pursuant to that rule, I have retained local counsel to assist in the representation of this case and I agreed that local counsel



will "be actively engaged in the conduct of the matter or litigation, shall sign all pleadings, documents and briefs and shall be present throughout all court or administrative appearances."

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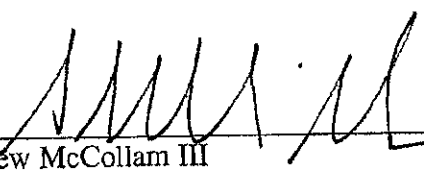
6. In Good Standing: I am in good standing in all bars of which I am a member.

7. No Previous Disciplinary or Grievance Proceedings: No disciplinary or grievance proceedings have been previously filed against me.

8. No Current Disciplinary or Grievance Proceedings: No disciplinary or grievance proceedings are pending against me.

9. No Felony or Unprofessional Conduct. I have not been charged in any court of the United States or of any state, territory, or possession of the United States with the commission of a felony or unprofessional conduct.

Respectfully submitted,



Andrew McCollam III

STATE OF TEXAS)
) ss.
COUNTY OF HARRIS)

Subscribed and sworn to before me this 21st day of ^{September}~~August~~, 2006 by Andrew McCollam III.

My Commission expires:


Notary Public

