

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

FILED

DISTRICT COURT

OKLAHOMA COUNTY, OKLAHOMA

September 18, 2026 11:09 AM

RICK WARREN, COURT CLERK

Case Number CJ-2025-2626

BILLY & LACY HURSH,

Plaintiffs,

v.

STATE FARM FIRE & CASUALTY
COMPANY; MARK D. WELTY; and
MARK D. WELTY INSURANCE
AGENCY, INC.,

Defendants.

Case No. CJ-2025-2626

Hon. Amy Palumbo

MOTION FOR ADMISSION PRO HAC VICE OF SAMUEL J. PARK

Defendant State Farm Life Fire & Casualty Company. (hereinafter “State Farm”), by and through counsel of record who has appeared in this case, Lance E. Leffel of the firm GABLEGOTWALS, requests the Court, pursuant to 12 O.S. § 2005.2(B) and Article 2, Section 5 of the Rules Creating and Controlling the Oklahoma Bar Association, to admit Samuel J. Park to practice before this Court solely for the purpose of appearing as counsel for State Farm Defendants in the above-styled case. By filing this Motion, State Farm expressly reserves, and does not waive, any available defenses.

In support of this Motion, State Farm Defendants’ counsel represents to the Court as follows:

- 1.) Samuel J. Park is an attorney with Alston & Bird, LLP; 350 S. Grand Ave., 51st Floor, Los Angeles, CA 90071
- 2.) Samuel J. Park is admitted to practice before the courts of the State of California.
- 3.) Samuel J. Park has never been the subject of a complaint charging unethical professional conduct and has never been subject to discipline by any bar association or any other

applicable authority.

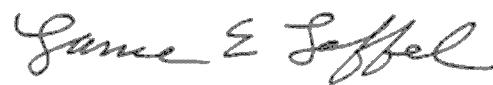
4.) This Motion is supported by the attached “Signed Application” submitted to the Oklahoma Bar Association (Exhibit “A”), “Certificates of Good Standing” (Exhibit “B”), the “Certificate of Compliance” (Exhibit “C”) from the Oklahoma Bar Association and the “Declaration of Samuel J. Park (Exhibit “D”) as required by 12 O.S. § 2005.2(B) and Section 5 of Article 2 of the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Appendix 1.

5.) Lance E. Leffel of the firm GableGotwals is an active member of the Oklahoma Bar Association and resident of the State of Oklahoma, whose address is stated below, and who has previously entered an appearance in this case. GableGotwals is associated with Samuel J. Park as local counsel for State Farm Defendants.

6.) A proposed Order is submitted herewith.

WHEREFORE, the undersigned counsel respectfully requests that Samuel J. Park be admitted to practice before the Court in the above-captioned case as additional counsel of record for State Farm Defendants.

Respectfully submitted,



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Grant A. Fitz, OBA No. 19806
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-and-

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***Attorneys for Defendant
State Farm Fire and Casualty Company***

CERTIFICATE OF MAILING

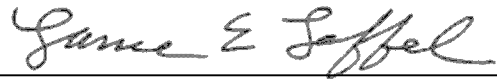
I do hereby certify that on September 18, 2026, a true, correct and exact copy of the above and foregoing document was served by placing same in the United States mail, with proper postage thereon duly prepaid, to those parties as listed below:

Reggie N. Whitten
Michael Burrage
Blake Sonne
Hannah Whitten
John S. Sanders
Jake Denne
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Patrick F. Collogan
BIBY LAW FIRM
6305 E. 120th Ct., Suite F
Tulsa, OK 74137
pat@bibylaw.com

Attorneys for Plaintiffs



APPLICATION

OUT OF STATE ATTORNEY REGISTRATION



APPROVED

Samuel J Park, Applicant, respectfully represents:
First Name Middle Name Last Name

1. Applicant is an attorney at law and a member of the law firm of _____
Alston & Bird LLP

Applicant's mailing address is 350 S. Grand Ave., 51st. Fl
Los Angeles, Los Angeles, CA, 90071
City County State Zip Code
(213) 576-1000, (213) 576-2687, (213) 576-1100
Telephone (Firm) Telephone (Applicant's Direct Dial) Fax (Applicant)

Samuel.Park@alston.com
E-mail Address (Applicant)

2. Applicant is admitted to practice and is a member in good standing
(certificates of good standing attached) of the bar(s) of the highest state court(s)
of the following state(s):

<u>State</u>	<u>Date of Admission</u>
<u>California</u>	<u>12/1/2006</u>

3. Applicant is admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States, and/or other tribunals on the dates indicated for each, and is presently a member in good standing of the bars of said courts:

<u>Tribunal</u>	<u>Date of Admission</u>
<u>USDC Central California</u>	<u>12/27/2006</u>
<u>USDC Northern California</u>	<u>11/8/2007</u>
<u>USDC Southern California</u>	<u>11/8/2007</u>

EXHIBIT A

4. Have you ever been suspended or disbarred in any court except as hereinafter provided (Give particulars; e.g. court, jurisdiction, date): No

5. Are you currently subject to any pending disciplinary proceedings by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, date, status): No

6. Have you ever received public discipline including, but not limited to, suspension or disbarment, by any organization with authority to discipline attorneys at law except as hereinafter provided (Give particulars; e.g. court, discipline authority, type of discipline, date, status): No

7. Have you ever had any certificate or privilege to appear and practice before any regulatory or administrative body suspended or revoked except as hereinafter provided (Give particulars; e.g. administrative body, date, status of suspension or reinstatement):
No

8. Applicant seeks admission to practice in the State of Oklahoma in the following matter (give particulars; e.g. caption of case, court or agency, type of matter, party to be represented): **Note - A separate application is to be submitted for each matter in which the applicant seeks admission!**

Billy & Lacy Hursh v. State Farm Fire & Casualty Company; Mark D. Welty; and
Mark D. Welty Insurance Agency, Inc. - Case No. CJ-2025-2626, Hon. Amy Palumbo
Oklahoma County, State of Oklahoma.

We represent State Farm Fire & Casualty Company, Mark D. Welty and Mark D.
Welty Insurance Agency, Inc.

9. The Oklahoma Bar Association member who is counsel of record for Applicant in this matter is:

Lance	E.	Leffel	19511
First Name	Middle Name	Last Name	O.B.A. Number
599 W. Sheridan Avenue, Suite 2200		Oklahoma City OK	73102
Mailing Address		City	State
Zip Code			
(405) 235-5500	(405) 235-2875	lleffel@gablelaw.com	
Telephone Number	Fax Number	E-mail Address	

10. The following accurately represents the names of each party in this matter and the names and addresses of each counsel of record who appear for that party:

<u>Party Name</u>	<u>Counsel Name</u>	<u>Address of Counsel</u>
Billy Hursh	Patrick Collogan	6305 E. 120th Ct., Suite F, Tulsa, OK 74137
Lacy Hursh		
	Blake Sonne	512 N. Broadway Ave, Ste 300, Oklahoma City, OK 73102
	Reggie Whitten	512 N. Broadway Ave, Ste 300, Oklahoma City, OK 73102
	Hannah Whitten	512 N. Broadway Ave, Ste 300, Oklahoma City, OK 73102
	John Sanders	512 N. Broadway Ave, Ste 300, Oklahoma City, OK 73102
	Jake Denne	512 N. Broadway Ave, Ste 300, Oklahoma City, OK 73102
	R. Ryan Deligans	920 North Harvey, Oklahoma City, OK 73102

11. Applicant certifies that he/she shall be subject to the jurisdiction of the courts and disciplinary boards of this state with respect to the laws of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association.

12. Applicant understands and shall comply with the standards of professional conduct required of members of the Oklahoma Bar Association.

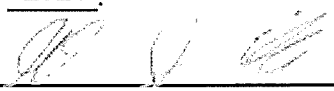
13. Applicant has disclosed in writing to the client that the Applicant is not admitted to practice in this jurisdiction and the client has consented to such representation.

I, Samuel J. Park, do hereby swear/affirm under penalty of perjury that the assertions of this application are true:

I am the Applicant in the above referenced matter; I have read the foregoing and know the contents thereof; the same is true of my own knowledge except as to those matters therein stated on information and belief, and as to those matters I believe them to be true.

I further certify that I am subject to the jurisdiction of the Courts and disciplinary boards of this state with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the Oklahoma Bar Association; I understand and shall comply with the standards of professional conduct required by members of the Oklahoma Bar Association; and that I am subject to the disciplinary jurisdiction of the Oklahoma Bar Association with respect to any of my actions occurring in the course of such appearance.

DATED this 3rd day of September, 2026.



Applicant

Mail with check or money order (payable to the OBA) to:

Out-of-State Attorney Registration
Oklahoma Bar Association
P.O. Box 53036
Oklahoma City, OK 73152-3036

THE STATE BAR OF CALIFORNIA

CERTIFICATE OF STANDING

ISSUE DATE: 8/31/2026

LICENSEE NAME: Samuel Joon Park

LICENSEE BAR NUMBER: 245327

LICENSEE STATUS: Active

ADMIT DATE: 12/1/2006

To Whom it May Concern:

This certificate of standing certifies the record above is a true and correct copy of Samuel Joon Park's current standing with the State Bar of California as of the issue date. No recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.



Carolina Almarante-Terrero

Custodian of Record

EXHIBIT B

NOTE: Only ACTIVE licensees of the State Bar of California are entitled to practice law in California (See Sections 6006 and 6125, et seq., Business and Professions Code.)



Certificate of Compliance

Oklahoma Bar Association
1901 North Lincoln Boulevard
Post Office Box 53036
Oklahoma City, Oklahoma 73152-3036

The Oklahoma Bar Association, in response to the application of out-of-state attorney, submits the following certificate pursuant to 5 O.S. Ch.1 App.1, Art. II

1. Applicant has submitted a signed application of out-of-state attorneys, certificate(s) of good standing, and the non-refundable application fee pursuant to the Rules Creating and Controlling the Oklahoma Bar Association, 5 O.S. Ch. 1, App. 1, Art. II.
2. Date of Application: **September 11, 2026**
3. Application Number: **2026-561**
4. Applying Attorney: **Samuel J. Park**
Alston & Bird LLP
350 S. Grand Ave., 51st Fl
Los Angeles, CA 90071
5. The Application was: **GRANTED**

Dated this **15th** day of **September, 2026**.



Gina Hendryx, General Counsel
Oklahoma Bar Association

EXHIBIT C

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

BILLY & LACY HURSH,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. CJ-2025-2626
	)	Hon. Amy Palumbo
STATE FARM FIRE & CASUALTY	)	
COMPANY; MARK D. WELTY; and	)	
MARK D. WELTY INSURANCE	)	
AGENCY, INC.,	)	
	)	
Defendants.	)	

**DECLARATION OF SAMUEL J. PARK IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE***

I, Samuel J. Park do hereby declare that I have read the above and foregoing Motion for Admission of Counsel *Pro Hac Vice* in its entirety. Each and every statement contained therein is within my personal knowledge and is true and correct.

The undersigned, an attorney to practice before the courts of the State of California, declares under penalty of perjury that the foregoing is true and correct and that this Declaration was executed on 9/18/2026.



Samuel J. Park