

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

VENISE THERESA GONYA, et al.

v.

ROGER A. SEVIGNY, et al.

Docket No. 04-E-0208

MOTION TO ADMIT ATTORNEYS *PRO HAC VICE*
WITH ASSENT

NOW COME Venise Theresa Gonya and Roxane S. Scaife, Plaintiffs in the above-entitled matter, by and through their attorneys, Watson & Lemire, P.A. and respectfully request that this Court permit the admission *pro hac vice* of Attorneys Alan Rich and Stephen Blackburn of the firm of Baron & Budd, P.C. in this action. In support of this motion, the plaintiffs state as follows:

1. The Plaintiffs have retained the firm of Baron & Budd, P.C., 3102 Oaklawn Avenue, Suite 1100, Dallas, Texas 75219-4281 to represent them in claims for injuries and other damages caused by tortious acts committed by entities insured or believed to be insured by The Home Insurance Company or its subsidiaries. The Home Insurance Company is being liquidated by the State of New Hampshire Insurance Department.

2. Plaintiffs are desirous of also having Baron & Budd, P.C. represent them in the within action which raises constitutional challenges to certain provisions of RSA 402-C, New Hampshire's Insurers Rehabilitation and Liquidation Statute. Attorneys Alan Rich and Stephen Blackburn wish to participate in this case *pro hac vice* and request permission to do so pursuant to Superior Court Rule 19.

3. Attorney Alan Rich is a member in good standing of the bars of the states of Texas and Illinois. He is also admitted and in good standing before the United States Supreme Court, the United States Court of Appeals for the Third, Fifth and Ninth Circuits, United States District Courts for the Northern District of Texas, Southern District of Texas, Eastern District of Texas, Western District of Texas and Northern District of Illinois, the United States Tax Court and the United States Court of Federal Claims. See attached Affidavit of Alan Rich.

4. Attorney Stephen Blackburn is a member in good standing of the bars of the state of Texas and the United States District Court for the Northern District of Texas. See attached Affidavit of Stephen Blackburn.

5. In accordance with Superior Court Rule 19, the undersigned attorneys shall at all times be associated with Messrs. Rich and Blackburn in this action and shall in all respects comply with the provisions of that rule.

6. Counsel for the defendants has been apprised of this motion and has indicated her assent to granting the relief sought herein.

WHEREFORE, the plaintiffs respectfully pray that this Court:

- A. Permit the *pro hac vice* admission of Attorneys Alan Rich and Stephen Blackburn;
- B. Grant such other and further relief as the Court may deem just.

Dated: July 27, 2004

Respectfully submitted,
Venice Theresa Gonya and
Roxanne S. Scaife, Plaintiffs
By their attorneys
WATSON & LEMIRE, P.A.

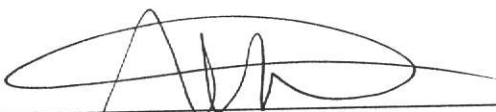
By: 
Thomas R. Watson, Esq. NH Bar #2670

Jennifer A. Lemire, Esq. NH Bar #11316
75 Congress Street, Suite 211
Portsmouth, NH 03801
Telephone: (603) 436-7667

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion to Admit Attorneys *Pro Hac Vice* was on this date mailed, postage prepaid/ hand delivered to Attorney Suzanne M. Gorman, New Hampshire Attorney General's Office, 33 Capital Street, Concord, NH 03301-6397.

Dated: July 27, 2004



Thomas R. Watson, Esq.