

THE STATE OF NEW HAMPSHIRE
SUPREME COURT

In the Matter of the Liquidation of
The Home Insurance Company

No. 2004-0319

MOTION TO ADMIT PRO HAC VICE

Ronald L. Snow, a member of the Bar of the State of New Hampshire, moves for admission *pro hac vice* of Gary S. Lee, Esquire, Eric A. Haab, Esquire, Gail M. Goering, Esquire, Pieter Van Tol, Esquire, and Adam Goodman, Esquire, attorneys in the Lovells Law Firm, as counsel to Century Indemnify Company, ACE Property and Casualty Insurance Company, Pacific Employers Insurance Company, and ACE American Reinsurance Company (collective, the "ACE Companies"). In support of this motion, I state as follows:

(1) As set forth in greater details in the affidavits of Gary S. Lee, Esquire, Eric A. Haab, Esquire, Gail M. Goering, Esquire, Pieter Van Tol, Esquire, and Adam B. Goodman, Esquire previously filed with the Merrimack County Superior Court and submitted herewith, each of these attorneys are licensed to practice before the Bars of the states of New York and/or Illinois, as well as other jurisdictions.

(2) Each of these attorneys is a member in good standing and eligible to practice in each jurisdiction and court to which he or she has been admitted.

(3) None of these attorneys is currently suspended or disbarred in any jurisdiction and none is aware of any pending disciplinary matter against him or her.

(4) I will be actively associated with Gary S. Lee, Esquire, Eric A. Haab, Esquire, Gail M. Goering, Esquire, Pieter Van Tol, Esquire, and Adam Goodman, Esquire during the pendency of this matter, and I, or a member of my firm, will be present at all hearings in this



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NEW HAMPSHIRE
SUPREME COURT
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matter.

WHEREFORE, Ronald L. Snow respectfully requests that this Court:

- A. Grant this motion; and
- B. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

Century Indemnity Company,
ACE Property and Casualty Insurance
Company, Pacific Employers Insurance
Company, and ACE American Reinsurance
Company

By their attorneys,

ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550
Telephone (603) 224-2381
Facsimile (603) 224-2318

Date: June 11, 2004

By Martha Van Oost
Ronald L. Snow

CERTIFICATE OF SERVICE

I, Ronald L. Snow, certify that on this 11th day of June, 2004, copies of the foregoing Motion to Admit *Pro Hac Vice* have been sent to the attached service list.

Martha Van Oost
Ronald L. Snow

CERTIFICATE OF SERVICE

The undersigned certifies that I served a copy of the foregoing on the following counsel via First Class mail on June 11, 2004.

William S. McGraw, Esq., Clerk
Merrimack County Superior Court
169 North Main Street
P.O. Box 2880
Concord, NH 03302-2880

Peter C. L. Roth
Senior Assistant Attorney General
Environmental Protection Bureau
New Hampshire Department of Justice
Attorney General's Office
33 Capitol Street
Concord, NH 03301-6397

Paula Rogers
Case Administrator
Office of the Liquidation Clerk
The Home Insurance Company
286 Commercial Street
Manchester, NH 03101

Suzanne M. Gorman, Esq.
Civil Bureau
New Hampshire Department of Justice
Attorney General's Office
33 Capitol Street
Concord, NH 03301-6397

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Sandler, Ahearn & McGonaughty, PLLC
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Seattle, WA 98101-3135

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Hale and Dorr, LLP
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Boston, MA 02109

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ACE USA Legal Dept.
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Suloway & Hollis, PLLC
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Concord, NH 03302-1256

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Swope & Nicolosi, PLLC
58 Pleasant Street
Concord, NH 03301

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New York, NY 10022

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900 Third Avenue
New York, NY 10022

Salvatore Tollis, Esq.
Lovells – 16th Floor
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New York, NY 10022

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Lovells
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Chicago, IL 60611

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Lovells
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330 N. Wabash Avenue
Suite 1900
Chicago, IL 60611

Adam Goodman, Esq.
Lovells
One IBM Plaza
330 N. Wabash Avenue
Suite 1900
Chicago, Illinois 60611

Connie Rakowsky, Esq.
Orr & Reno, PA
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550

Martha Van Or
Ronald L. Snow

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THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of
The Home Insurance Company

No. 03-E-0106

AFFIDAVIT OF GARY S. LEE

Gary S. Lee, Esquire, having been duly sworn, deposes and says:

1. My name is Gary S. Lee, and I am a partner in the firm of Lovells, 900 Third Avenue, 16th Floor, New York, New York 10022.
2. I am licensed to practice law in the State of New York (admitted 1991) and have been admitted to practice before the following courts:

United States District Court for the Eastern District of New York;
United States District Court for the Southern District of New York; and
United Kingdom and Wales.
3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

Dated: March 29, 2004

Gary S. Lee
Gary S. Lee
Bar No. GSL-6049

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:

On this 29 day of March, 2004, personally appeared before the undersigned, Gary S. Lee, who made oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.



Notary Public

My commission expires: 7/10/06

LESCENE GIBBONS
Notary Public, State of New York
No. 01G16044509
Qualified in New York County
Commission Expires July 10, 20 06

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of
The Home Insurance Company

No. 03-E-0106

AFFIDAVIT OF ERIC A. HAAB

Eric A. Haab, Esquire, having been duly sworn, deposes and says:

1. My name is Eric A. Haab, and I am a partner in the firm of Lovells, One IBM Plaza, 330 N. Wabash Avenue, Suite 1900, Chicago, Illinois 60611.
2. I am licensed to practice law in the State of Illinois (admitted 1989) and have been admitted to practice before the following additional courts:

United States Court of Appeals for the Ninth Circuit; and
United States District Court for the Northern District of Illinois.
3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

Dated: 3/30/04



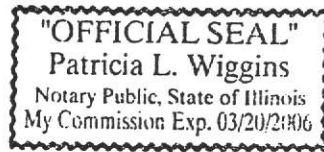
Eric A. Haab
Bar No. 6201275

STATE OF ILLINOIS)
COUNTY OF COOK) ss.:

On this 30 day of March, 2004 personally appeared before the undersigned,
Eric A. Haab, who made oath that the facts recited in the foregoing affidavit are true to the best
of his knowledge and belief.

Patricia L. Wiggins
Justice of the Peace/Notary Public

My commission expires: 03/20/06



THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of
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No. 03-E-0106

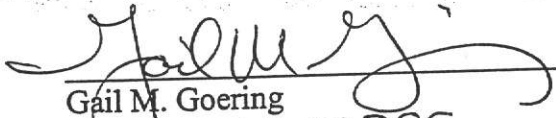
AFFIDAVIT OF GAIL M. GOERING

Gail M. Goering, Esquire, having been duly sworn, deposes and says:

1. My name is Gail M. Goering, and I am a partner in the firm of Lovells, One IBM Plaza, 330 N. Wabash Avenue, Suite 1900, Chicago, Illinois 60611.
2. I am licensed to practice law in the State of Illinois (admitted 1990) and in the State of New York (admitted 1999) and have been admitted to practice before the following courts:

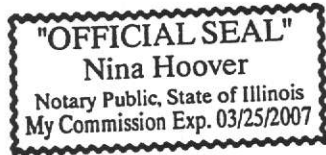
U.S. Court of Appeals for the Ninth Circuit;
United States District Court for the Northern District of Illinois;
United States District Court for the Eastern District of New York; and
United States District Court for the Southern District of New York.
3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

Dated: 30 March 2004


Gail M. Goering
IL Bar No. 62 03795
NY Bar No. 2951952

STATE OF ILLINOIS)
COUNTY OF COOK) ss.:

On this 30th day of MARCH, 2004 personally appeared before the undersigned, Gail M. Goering, who made oath that the facts recited in the foregoing affidavit are true to the best of her knowledge and belief.



Nina Hoover
Justice of the Peace/Notary Public

My commission expires: 3-25-07

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of
The Home Insurance Company

No. 03-E-0106

AFFIDAVIT OF PIETER VAN TOL

Pieter Van Tol, Esquire, having been duly sworn, deposes and says:

1. My name is Pieter Van Tol, and I am associated with the firm of Lovells, 900 Third Avenue, 16th Floor, New York, New York 10022.
2. I am licensed to practice law in the State of New York (admitted 1995) and have been admitted to practice before the following courts:

United States District Court for the Northern District of New York; and
United States District Court for the Southern District of New York.
3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

Dated: 3/29/64

Pieter Van Tol
Pieter Van Tol
Bar No. PVT-2455

STATE OF NEW YORK)
COUNTY OF NEW YORK) ss.:

On this 29 day of March, 2004 personally appeared before the undersigned, Pieter Van Tol, who made oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.

Lesene Gibbons
Notary Public

My commission expires: 7/10/06

LESCENE GIBBONS
Notary Public, State of New York
No. 01GI6044509
Qualified in New York County
Commission Expires July 10, 20 06

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In the Matter of the Liquidation of
The Home Insurance Company

No. 03-E-0106

AFFIDAVIT OF ADAM GOODMAN

Adam Goodman, Esquire, having been duly sworn, deposes and says:

1. My name is Adam Goodman, and I am associated with the firm of Lovells, One IBM Plaza, 330 N. Wabash Avenue, Suite 1900, Chicago, Illinois 60611.
2. I am licensed to practice law in the State of Illinois (admitted 1995) and have been admitted to practice before the following courts:

Supreme Court of the United States;
United States Court of Appeals for the Seventh Circuit;
United States Court of Appeals for the Eighth Circuit;
United States Court of Appeals for the Ninth Circuit;
United States Court of Appeals for the Tenth Circuit;
United States District Court for the District of Colorado;
United States District Court for the Central District of Illinois;
United States District Court for the Northern District of Illinois;
United States District Court for the Southern District of Illinois;
United States District Court for the Northern District of Indiana;
United States District Court for the Southern District of Indiana;
United States District Court for the Western District of Michigan; and
United States District Court for the Eastern District of Wisconsin.

3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

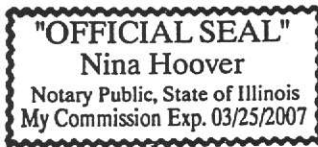
Dated: March 30, 2004



Adam Goodman
Bar No. Illinois 6229333

STATE OF ILLINOIS)
COUNTY OF COOK) ss.:

On this 30th day of MARCH, 2004 personally appeared before the undersigned, Adam Goodman, who made oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.



Nina Hoover
Justice of the Peace/Notary Public

My commission expires: 3-25-07