

**STATE OF NEW HAMPSHIRE**

**MERRIMACK COUNTY**

**SUPERIOR COURT**

**Docket No.: 217-2033-EQ-00106**

**In the Matter of the Liquidation of the Home Insurance Company**

**MOTION FOR PRO HAC VICE ADMISSION**

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R. Matthew Cairns, on behalf of Nationwide Mutual Insurance Company, moves for the admission *pro hac vice* of Keith Dotseth, Esquire, and says:

1. Keith Dotseth is counsel to Nationwide Mutual Insurance Company. Keith Dotseth now seeks admission to practice before this Honorable Court.

2. Keith Dotseth is a member in good standing of the Bar of the courts listed on the attached Declaration of Keith Dotseth and seeks to participate actively in the preparation and trial of this case.

3. R. Matthew Cairns, Esquire and Gallagher, Callahan & Gartrell, P.C., will remain associated during the pendency of this action with the intent that all process, notices and other papers shall be served upon local counsel. Local counsel will execute all filings submitted to the Court and will attend proceedings unless excused by the Court.

4. Pursuant to Superior Court Rule 19, the Declaration of Keith Dotseth is attached to this Motion along with his \$250 admission fee. Due to the nature of this motion, no further affidavit is required.

5. Due to the nature of this motion, no memorandum is necessary.

Wherefore, R. Matthew Cairns respectfully requests that the Honorable Court:

A. Grant the motion to admit Keith Dotseth *pro hac vice* for the purpose of representing Nationwide Mutual Insurance Company in this matter; and

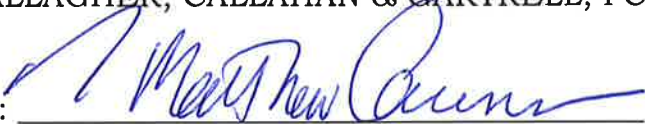
B. Grant such further relief as justice requires.

Respectfully submitted,

NATIONWIDE MUTUAL INSURANCE  
COMPANY

By Its Attorneys  
GALLAGHER, CALLAHAN & GARTRELL, PC

Dated: July 20, 2017

By: 

R. Matthew Cairns, Esq. (#411)  
214 North Main St.  
Concord, NH 03301  
(603) 228-1181  
cairns@gcglaw.com

**Certificate of Service**

I hereby certify that a copy of the foregoing Motion for Pro Hac Vice Admission and Declaration of Keith Dotseth were sent this \_\_\_\_\_ day of July, 2017, by first class mail, postage prepaid to all persons on the attached service list.

Dated: July 20, 2017

By: 

R. Matthew Cairns, Esq. (#411)

**STATE OF NEW HAMPSHIRE**

**MERRIMACK COUNTY**

**SUPERIOR COURT**

**Docket No.: 217-2033-EQ-00106**

**In the Matter of the Liquidation of the Home Insurance Company**

**DECLARATION IN SUPPORT OF MOTION FOR KEITH DOTSETH  
TO APPEAR PRO HAC VICE**

Pursuant to Rule 19 of the New Hampshire Civil Rules of Superior Court, the undersigned hereby requests permission to appear *pro hac vice* and participate in this litigation on behalf of Nationwide Mutual Insurance Company. In support of this request, the undersigned affirms the following under penalty of perjury:

1. My residential address is 812 Fairmount Avenue, St. Paul, Minnesota 55105. I am a partner at the firm Larson • King, which has an address of 30 East Seventh Street, Suite 2800, Saint Paul, Minnesota 55101.

2. My client is Nationwide Mutual Insurance Company. Their address is PO Box 8101, Wausau, Wisconsin, 54402; their phone number is 715-843-8600.

3. I have been admitted to practice before the following courts in the years noted. I am a member in good standing of all courts to which I have been admitted.

Minnesota (1990); United States District Court for District of Columbia (2010); United States District Court for Western District of Michigan (2015); United States District Court for District of

Minnesota (1990); United States District Court for Northern District of New York (2012); United States District Court for Southern District of Ohio (2011); United States District Court for Western District of Wisconsin (2004); United States Court of Appeals, First Circuit (2014); United States Court of Appeals, Third Circuit (2002); United States Court of Appeals, Eighth Circuit (2004).

4. I have never been denied *pro hac vice* in the State of New Hampshire. I have never had a *pro hac vice* admission revoked in the State of New Hampshire. I have never been formally disciplined or sanctioned by a New Hampshire court.

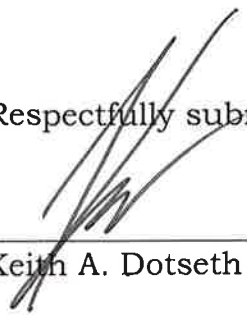
5. I have not had any formal, written disciplinary proceeding brought against me by any court in any jurisdiction in the last five years.

6. I have not been formally held in contempt or otherwise sanctioned by any court in any jurisdiction in the last five years for disobedience of court rules or orders.

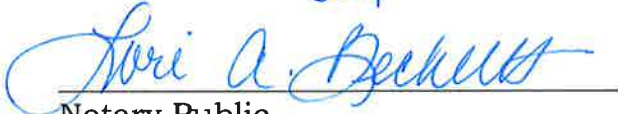
7. I have not applied to appear *pro hac vice* in the State of New Hampshire in the preceding two years.

8. R. Matthew Cairns (NH Bar No. 411) is an active member in good standing of the Bar of New Hampshire with whom I will associate and who will be present at any trial or hearing. Mr. Cairns is a shareholder of Gallagher, Callahan & Gartrell, P.C., 214 N. Main Street, Concord, New Hampshire, 03301; (603) 228-1181.

Respectfully submitted,

  
\_\_\_\_\_  
Keith A. Dotseth

SUBSCRIBED and SWORN to before me  
this <sup>20<sup>th</sup></sup> day of ~~June~~ <sup>July</sup>, 2017.

  
\_\_\_\_\_  
Notary Public

