

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket #217-2003-EQ-00106

In the Matter of the Liquidation of  
The Home Insurance Company

**MOTION TO ADMIT MICHAEL P. MULLINS AS COUNSEL *PRO HAC VICE***

Indemnity Marine Assurance Company, Nederlandse Reassurantie Groep NV, NRG Victory Reinsurance Ltd, NRG Fenchurch Insurance Company Ltd, New Zealand Reinsurance Company, Tenecom Ltd, Underwriters of Lloyd's of London, Winterhur Swiss Insurance Company and World Auxiliary Corporation Limited ("Objectors"), by and through their New Hampshire counsel, Terri L. Pastori, of Pastori | Krans, PLLC, respectfully move this Honorable Court for special admission of Michael P. Mullins, *pro hac vice*, as co-counsel for the purpose of representing the Objectors in this action. In support of this Motion, the Objectors state as follows:

1. Michael P. Mullins is a partner at the law firm of Day Pitney LLP, One International Place, Boston, MA 02110. His residential address is 222 Hershey Street, Hingham, MA. His business phone number is (617) 345-4776. His email is [mmullins@daypitney.com](mailto:mmullins@daypitney.com).

2. Attorney Mullins is and has been a member in good standing of the bar of the State of Illinois since 1999 and of the bar of the Commonwealth of Massachusetts since 2006. In addition, he is and has been a member in good standing of the United States District Court for the Northern District of Illinois since 1999; the United States District Court for the

District of Massachusetts since 2006; the First Circuit Court of Appeals since 2006; and the Seventh Circuit Court of Appeals since 1999.

3. Attorney Mullins has not been denied admission *pro hac vice* in this State; or had admission *pro hac vice* revoked in this State; nor has he been otherwise formally disciplined or sanctioned by any court in this State.

4. No formal, written disciplinary proceeding has been brought against him in any jurisdiction. He has not been held in contempt or otherwise sanctioned by any court.

5. Attorney Mullins has not filed an application to appear *pro hac vice* in New Hampshire within the preceding two years.

6. The undersigned counsel, Attorney Terri L. Pastori (New Hampshire Bar Number 12136) of Pastori | Krans, PLLC, located at 70 Commercial Street, Suite 203, Concord, NH 03301, (603) 369-4769, will serve as co-counsel to Attorney Mullins and will be present at any trial or hearing, unless excused by the Court.

7. Pursuant to Superior Court Rule 19, the Verified Application of Michael P. Mullins in support of this Motion to Admit Counsel *Pro Hac Vice* has been filed with this Motion.

WHEREFORE, the Objectors respectfully requests that this Honorable Court:

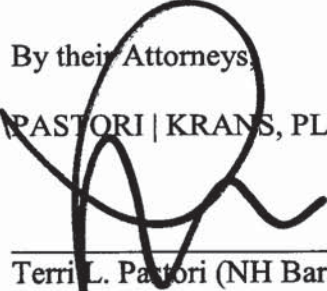
- A. Grant this Motion to Admit Michael P. Mullins *Pro Hac Vice*; and
- B. Grant such other and further relief as this Court deems just and equitable.

Respectfully submitted,

INDEMNITY MARINE ASSURANCE CO.,  
NEDERLANDE REASSURANTIE GROEP NV,  
NRG VICTORY REINSURANCE LIMITED,  
NRG FENCHURCH INSURANCE COMPANY  
LTD, NEW ZEALAND REINSURANCE  
COMPANY, TENECOM LIMITED,  
UNDERWRITERS AT LLOYD'S OF  
LONDON, WINTERHUR SWISS INS. CO.,  
AND WORLD AUXILIARY CORP. LTD.

By their Attorneys,

PASTORI | KRANS, PLLC

  
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11/18/19

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was sent this 18th day of November 2019 by First-Class Mail to all persons on the attached service list.



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Terri L. Pastori

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