



**THE STATE OF NEW HAMPSHIRE**

**MERRIMACK, SS.**

**SUPERIOR COURT**

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

**Docket No. 217-2003-EQ-00106**

**VERIFIED APPLICATION TO ADMIT COUNSEL PRO HAC VICE**

Attorney Thomas W. Ladd hereby applies to practice before this Court in the above-referenced action pursuant to Superior Court Rule 19 and in support thereof says:

1. I reside at 16 Buena Vista Avenue, Fair Haven, NJ 07704. My business address is Four Gateway Center, 100 Mulberry Street, Newark, NJ 07102.

2. I seek to represent Johnson & Johnson ("J&J") in the above-captioned matter. J&J's business address is One Johnson & Johnson Plaza, New Brunswick, NJ 08933.

3. I am a member in good standing of the bars of New Jersey and Ohio and eligible to practice before the following courts:

New Jersey State Court (1986)

Ohio State Court (1990)

United States Court of Appeals for the 3<sup>rd</sup> Circuit (1986)

United States Court of Appeals for the 5<sup>th</sup> Circuit (1999)

United States Court of Appeals for the 6<sup>th</sup> Circuit (1998)

United States District Court, District of New Jersey (1986)

United States District Court, Northern District of Ohio (1990)

4. I have never been denied admission *pro hac vice* in this State and have never had my *pro hac vice* admission revoked in this State. I have not otherwise been formally disciplined or sanctioned by any court in this State.

5. No formal, written disciplinary proceeding has ever been brought against me by any disciplinary authority within the last five years.

6. I have never been held in contempt or otherwise sanctioned by any court in written order in the last five years for disobedience of its rules or orders.

7. In the preceding two years, I have not filed an application to appear *pro hac vice* in New Hampshire.

8. The following counsel serve as local counsel in this matter and will be associated with me and will be present at any trial or hearing:

David Himelfarb  
NH Bar # 19754  
McCarter & English, LLP  
265 Franklin Street, 14<sup>th</sup> Floor  
Boston, MA 02110  
Tel. 617-449-6500  
Fax 617-326-3086  
dhimelfarb@mccarter.com

WHEREFORE, Thomas W. Ladd respectfully requests that this Honorable Court:

A. Permit Thomas W. Ladd to practice before this Court in this action on behalf of J&J; and

B. Grant such other relief the Court deems just and proper.

Dated: January 28, 2020

Respectfully submitted,



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**VERIFICATION**

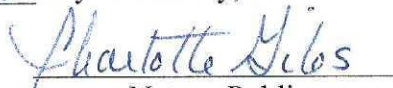
STATE OF NEW JERSEY

COUNTY OF ESSEX

Personally appeared before me, a notary public in and for said county in said state, Thomas W. Ladd who says he has read the foregoing Verified Application to Admit Counsel *Pro Hac Vice* and is informed and believes the facts stated therein are true and correct.

  
Thomas W. Ladd

Subscribed and sworn to me before this 28<sup>th</sup> day of January, 2020.

  
Notary Public

My commission expires: 7/21/2023

**CHARLOTTE GILES**  
Notary Public of New Jersey  
My Commission Expires July 21, 2023