

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

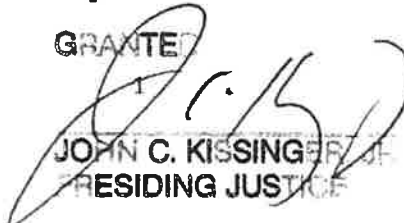
Docket No. 217-2003-EQ-00106

In the Matter of the Liquidation of  
The Home Insurance Company

MOTION TO ADMIT JOSEPH T. MCCULLOUGH IV  
AS COUNSEL *PRO HAC VICE*

Zurich Insurance plc, German Branch and Württembergische Versicherung AG (“Objecting Creditors”), by and through their New Hampshire counsel, McLane Middleton, Professional Association, respectfully move this Court for admission of Joseph T. McCullough IV *pro hac vice*, as co-counsel for the purpose of representing the Objecting Creditors in this action. In support of this Motion, the Objecting Creditors state as follows:

1. Joseph T. McCullough IV is a partner at the law firm of Freeborn & Peters LLP, 311 South Wacker Drive, Suite 3000, Chicago, Illinois 60606. His residential address is 380 Belle Foret Drive, Lake Bluff, IL 60044. His business phone number is (312) 360-6000. His email is [jmccullough@freeborn.com](mailto:jmccullough@freeborn.com).
2. Attorney McCullough is and has been a member in good standing of the bar of the State of Illinois since April 2, 1985. In addition, Attorney McCullough is and has been a member in good standing of the Seventh Circuit Court of Appeals since February 18, 1994.
3. Attorney McCullough has not been denied admission *pro hac vice* in this State, has not 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 had been brought against him in any jurisdiction. He has not been held in contempt or otherwise sanctioned by any court.

GRANTED  
  
JOHN C. KISSINGER  
PRESIDING JUSTICE  
2/28/2020

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

6. The below-listed attorneys will serve as co-counsel to Attorney McCullough and will be present at any trial or hearing, unless excused by the Court:

Attorney Mark C. Rouvalis (N.H. Bar No. 6565) of McLane Middleton, Professional Association, located at 900 Elm Street, 10<sup>th</sup> Floor, Manchester, NH 03101, (603) 628-1329;

Attorney Steven J. Dutton (N.H. Bar No. 17101) of McLane Middleton, Professional Association, located at 900 Elm Street, 10<sup>th</sup> Floor, Manchester, NH 03101, (603) 628-1379; and

Attorney Viggo C. Fish (Bar No. 267579) of McLane Middleton, Professional Association, located at 11 South Main Street, Suite 500, Concord, NH 03301, (603) 230-4412.

7. Pursuant to Superior Court Rule 19, the Verified Application of Joseph T. McCullough IV in support of this Motion to Admit Counsel *Pro Hac Vice* has been filed with this Motion.

WHEREFORE, the Objecting Creditors respectfully request that this Court

- A. Grant this Motion to Admit Joseph T. McCullough IV as Counsel *Pro Hac Vice*; and
- B. Grant such further relief as this Court deems just and reasonable.


Respectfully submitted,

ZURICH INSURANCE PLC GERMAN  
BRANCH AND WUERTTEMBERGISCHE  
VERSICHERUNG,

By their Attorneys,

McLANE MIDDLETON,  
PROFESSIONAL ASSOCIATION

Dated: November 22, 2019

By:  for: Mark C. Rouvalis

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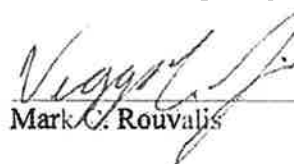
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**Certificate of Service**

I hereby certify that a copy of the foregoing Zurich Insurance plc German Branch's and Württembergische Versicherung AG's Motion to Admit Joseph T. McCullough IV as Counsel *Pro Hac Vice* was sent this 22nd day of November 2019 by first class mail, postage prepaid to all persons on the attached service list.

 for:  
Mark C. Rouvalis

**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**

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