

STATE OF NEW HAMPSHIRE

MERIMACK, SS.

SUPERIOR COURT

BEFORE THE COURT-APPOINTED REFEREE IN THE LIQUIDATION OF THE
HOME INSURANCE COMPANY DISPUTED CLAIMS DOCKET

CENTURY INDEMNITY COMPANY, Claimant, v. ROGER A. SEVIGNY, INSURANCE COMMISSIONER OF THE STATE OF NEW HAMPSHIRE, AS LIQUIDATOR OF THE HOME INSURANCE COMPANY, Respondent.	Proceeding No. 2005-HICIL-14
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MOTION TO ADMIT COUNSEL PRO HAC VICE

NOW COMES Metex Mfg. Corporation, debtor-in-possession (the “Debtor” or “Metex”), by and through its undersigned counsel, and hereby moves to permit Attorneys Paul E. Breene and Paul M. Singer, both of the law firm Reed Smith LLP, to practice before this Court in the above-referenced action. In support of this motion, Metex states as follows:

1. The undersigned are members of the Bar of this Court in good standing and are actively associated with Attorneys Paul E. Breene and Paul M. Singer, of the law firm Reed Smith LLP, in this action.
2. Attorney Breene’s verified application in accordance with Superior Court Rule 19 is attached hereton as **Exhibit A**.
3. Attorney Singer’s verified application in accordance with Superior Court Rule 19 is attached hereton as **Exhibit B**.
4. Metex requests that Attorneys Breene and Signer be permitted to appear for it, along with local counsel, in this matter.

WHEREFORE, Metex respectfully requests that this Court enter an order:

- (i) Permitting Attorneys Paul E. Breene and Paul M. Singer to practice before this Court in this action; and
- (ii) Grant such further relief as the Court deems just and appropriate.

Dated: August 2, 2013

Respectfully submitted,

RATH, YOUNG & PIGNATELLI, P.C.

By: 

Steven J. Lauwers, Esq. NH Bar ID No. 13079

Michael S. Lewis, Esqu. NH Bar ID No. 16466

One Capital Plaza

Concord, New Hampshire 03302

(603)410-4345

EXHIBIT A

STATE OF NEW HAMPSHIRE

MERIMACK, SS.

SUPERIOR COURT

CENTURY INDEMNITY COMPANY, Claimant, v. ROGER A. SEVIGNY, INSURANCE COMMISSIONER OF THE STATE OF NEW HAMPSHIRE, AS LIQUIDATOR OF THE HOME INSURANCE COMPANY, Respondent.	Proceeding No. 2005-HICIL-14
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VERIFIED APPLICATION TO ADMIT COUNSEL *PRO HAC VICE*

Paul E. Brcene hereby applies to practice before this Court in the instant action pursuant to Superior Court Rule 19 and in support thereof says:

1. I reside at 596 Longview Road, South Orange, New Jersey, 07079. My business address is 599 Lexington Avenue, 22nd Floor, New York, New York, 10022.
2. I seek to represent Metex Mfg. Corporation ("Metex"). Metex has a principle place of business located at 9 Park Place, Great Neck, New York, 11021.
3. I am a member in good standing of the bars of the following courts:

<u>Courts</u>	<u>Periods of Admission</u>
State of New York	1984
State of New Jersey	1984
United State Court of Appeals, Third Circuit	2002
United States District Court, Southern District of New York	1985
United States District Court, Eastern District of New York	1984
United States District Court, District of New Jersey	1984

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 or otherwise been formally disciplined or sanctioned by any court in this State.

5. No formal, written disciplinary proceeding has even 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 to 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 one or more of who will be present at any trial or hearing:

Steven J. Lauwers, Esq. NH Bar ID No. 13079
Michael S. Lewis, Esq. NH Bar ID No. 16466
One Capital Plaza
Concord, New Hampshire 03302
(603)410-4345

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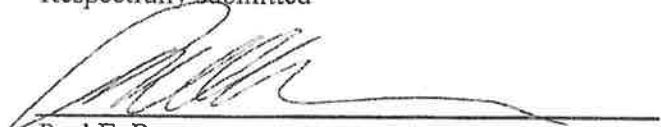
WHEREFORE, Paul E. Breene respectfully requests that this Honorable Court:

A. Permit Paul E. Breene to practice before this Court in this action on behalf of Metex;

and

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

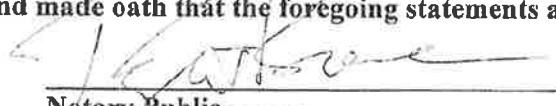
Respectfully submitted



Paul E. Breene
Reed Smith LLP
599 Lexington Avenue, 22nd Floor
New York, New York 10022
(212) 521-5400

NEW JERSEY
~~STATE OF NEW YORK~~
~~COUNTY OF NEW YORK~~ *SOMERSET*

Personally appeared before me on this *31st* day of July, 2013, the above-referenced named Paul E. Breene and made oath that the foregoing statements are true.



Notary Public
My Commission Expires: _____

Robert J. Breene
Attorney at Law
of New Jersey

EXHIBIT B

STATE OF NEW HAMPSHIRE

MERIMACK, SS.

SUPERIOR COURT

<p>CENTURY INDEMNITY COMPANY,</p> <p style="text-align: center;">Claimant,</p> <p>v.</p> <p>ROGER A. SEVIGNY, INSURANCE COMMISSIONER OF THE STATE OF NEW HAMPSHIRE, AS LIQUIDATOR OF THE HOME INSURANCE COMPANY,</p> <p style="text-align: center;">Respondent.</p>	<p>Proceeding No. 2005-HICIL-14</p>
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VERIFIED APPLICATION TO ADMIT COUNSEL PRO HAC VICE

Paul M. Singer hereby applies to practice before this Court in the instant action pursuant to Superior Court Rule 19 and in support thereof says:

1. I reside at 3 Edgehill Drive, Allison Park, Pennsylvania, 15101. My business address is Reed Smith, LLP, 225 Fifth Avenue, Pittsburgh, Pennsylvania, 15222.

2. I seek to represent Metex Mfg. Corporation ("Metex"). Metex has a principle place of business located at 9 Park Place, Great Neck, New York, 11021.

3. I am a member in good standing of the bars of the following courts:

<u>Courts</u>	<u>Periods of Admission</u>
Commonwealth of Pennsylvania	1968
United State Court of Appeals, Third Circuit	

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 or otherwise been formally disciplined or sanctioned by any court in this State.

5. No formal, written disciplinary proceeding has even 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 to 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 one or more of who will be present at any trial or hearing:

Steven J. Lauwers, Esq. NH Bar ID No. 13079
Michael S. Lewis, Esq. NH Bar ID No. 16466
One Capital Plaza
Concord, New Hampshire 03302
(603)410-4345

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WHEREFORE, Paul M. Singer respectfully requests that this Honorable Court:

- A. Permit Paul M. Singer to practice before this Court in this action on behalf of Metex;
- and
- B. Grant such other relief the Court deems just and proper.

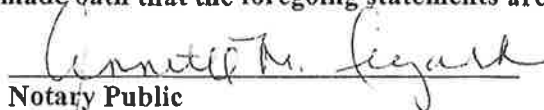
Respectfully submitted



Paul M. Singer
Reed Smith LLP
225 Fifth Avenue
Pittsburgh, PA 15222
(412) 288-3131

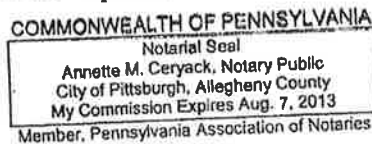
**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF ALLEGHENY**

Personally appeared before me on this 15th day of July, 2013, the above-referenced named Paul M. Singer and made oath that the foregoing statements are true.



Notary Public

My Commission Expires:



MERRIMACK, SS.

SUPERIOR COURT

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SERVICE LIST

Lisa Snow Wade, Esq.
Orr & Reno
One Eagle Square
P.O. Box 3550
Concord, New Hampshire 03302-3550

Paul W. Kalish, Esq.
Ellen M. Farrell, Esq.
Kristine E. Nelson, Esq.
Crowell & Moring
1001 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2595

J. David Leslie, Esq.
Eric A. Smith, Esq.
Rackemann, Sawyer & Brewster, P.C.
160 Federal Street
Boston, Massachusetts 02110

J. Christopher Marshall, Esq.
New Hampshire Department of Justice
33 Capitol Street
Concord, New Hampshire 03301