

THE STATE OF NEW HAMPSHIRE
SUPREME COURT

In the Matter of the Liquidation of
The Home Insurance Company

No. 2005-00740

MOTION TO ADMIT PRO HAC VICE

Lisa Snow Wade, a member of the Bar of the State of New Hampshire, moves for admission *pro hac vice* of Matthew T. Wulf, Esquire, of the Reinsurance Association of America. In support of this motion, I state as follows:

(1) As set forth in greater details in the affidavit of Matthew T. Wulf, Esq., Attorney Wulf is licensed to practice before the Bars of the District of Columbia and State of Maryland. His address in Reinsurance Association of American, 1301 Pennsylvania Ave, N.W. #900, Washington, DC 20004, telephone: 202-638-3690.

(2) He is a member in good standing and eligible to practice in each jurisdiction and court to which he has been admitted. He was previously admitted to practice before this Court in the initial appeal of this matter (2004-0319).

(3) He is not currently suspended or disbarred in any jurisdiction and is not aware of any pending disciplinary matter against him.

(4) I will be actively associated with Attorney Wulf during the pendency of this matter, and I, or a member of my firm, will be present at all hearings in this matter.

(5) Liquidator's counsel has not responded to a request for concurrence on this motion, but presumably does not concur given his refusal to concur in RAA's motion for leave to file brief as *amicus curiae*. Counsel for ACE Companies and Benjamin Moore concur in the relief requested herein.

WHEREFORE, Lisa Snow Wade respectfully requests that this Court:

- A. Grant this motion; and
- B. Grant such other and further relief as the Court deems just and proper.

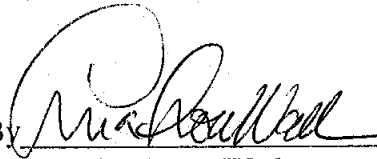
Respectfully submitted,

REINSURANCE ASSOCIATION OF
AMERICA

By their attorneys,

ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
Concord, NH 03302-3550
Telephone (603) 224-2381
Facsimile (603) 224-2318

Date: March 2, 2006

By 

Lisa Snow Wade

Certificate of Service

I, Lisa Snow Wade, Esq., hereby certify that on this 2nd day of March, 2006, I have caused a copy of the foregoing to be forwarded by first class US mail to:

Liquidator:

J. David Leslie, Esq.
Rackemann, Sawyer and Brewster
One Financial Center
Boston, MA 02111

J. Christopher Marshall, Esq.
Civil Bureau
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301-6397

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Benjamin Moore

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Lisa Snow Wade

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AFFIDAVIT OF MATTHEW T. WULF, ESQ.

Matthew T. Wulf, Esquire, having been duly sworn, deposes and says:

1. My name is Matthew T. Wulf, and I am member of the Law Department of the Reinsurance Association of America, 1301 Pennsylvania Avenue, N.W. #900, Washington, DC 20004.
2. I am licensed to practice law in the District of Columbia and State of Maryland. I was previously admitted to practice pro hac vice before this court in the initial appeal of this matter in docket no. 2004-0319, as well as in other jurisdictions.
3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Supreme Court Rules for the State of New Hampshire.

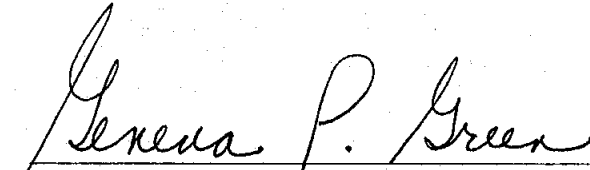
Date: February 28, 2006

By: 
Matthew T. Wulf, Esq.

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DISTRICT OF COLUMBIA
COUNTY OF:

On this 28th day of February, 2006, personally appeared before the undersigned, Matthew T. Wulf, who made oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.


Justice of the Peace/Notary Public

My commission expires: _____ **Geneva P. Green**
Notary Public of District of Columbia
My Commission Expires November 14, 2011

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