

**THE STATE OF NEW HAMPSHIRE**

**MERRIMACK, SS.**

**SUPERIOR COURT**

**Docket No. 03-E-0106  
In the Matter of the Liquidation of  
The Home Insurance Company**

**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 Kathleen E. Schaff, Esquire, of Lovells Law Firm. In support of this motion, I state as follows:

(1) As set forth in greater details in the affidavit of Kathleen E. Schaff, Esq., Attorney Schaff is licensed to practice before the Bar of New York State. Her address is Lovells Law Firm, 590 Madison Avenue, New York, New York 10022; telephone (212) 954-0800.

(2) She is a member in good standing and eligible to practice in the jurisdiction and court to which she has been admitted.

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

(4) I will be actively associated with Attorney Schaff 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 concurs on this motion.

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,

CENTURY INDEMNITY COMPANY,  
ACE PROPERTY & CASUALTY INSURANCE  
COMPANY, PACIFIC EMPLOYERS  
INSURANCE COMPANY AND ACE  
AMERICAN REINSURANCE COMPANY

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: February 1, 2007

By 

\_\_\_\_\_  
Lisa Snow Wade

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document has been served on Roger A. Sevigny, Commissioner of Insurance, Peter Bengelsdorf, Special Deputy, and the following counsel via First Class mail on February 1, 2007:

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Lisa Snow Wade

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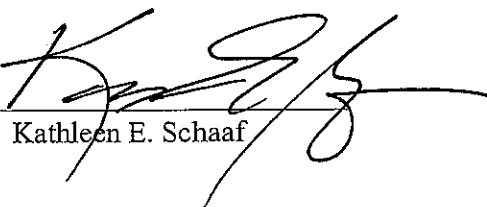
AFFIDAVIT OF KATHLEEN E. SCHAAF, ESQ.

Kathleen E. Schaaf, Esquire, having been duly sworn, deposes and says:

1. My name is Kathleen E. Schaaf, and I am Of Counsel at Lovells, 590 Madison Avenue, New York, New York 10022.
2. I am licensed to practice law in the State of New York.
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 Rules of the Superior Court of the State of New Hampshire.

Date: January 18, 2007

By:

  
Kathleen E. Schaaf

STATE OF NEW YORK        )  
                                  )    ss:  
COUNTY OF NEW YORK    )

On this 18th day of January, 2007, Kathleen E. Schaaf personally appeared before me and made an oath that the facts recited in the foregoing affidavit are true to the best of her knowledge and belief.

**LANI M. McCANN**  
**Notary Public, State of New York**  
**No. 02MC6060336**  
**Qualified in Westchester County**  
**Commission Expires June 25, 2007**

Sworn before me on this  
18th day of January, 2007

  
Notary Public