

STATE OF NEW HAMPSHIRE

MERRIMACK, ss

SUPERIOR COURT
2008 NOV -7 A 10: 57

Docket Nos. 03-E-0106

In The Matter of The Liquidation of The Home Insurance Company

NEW HAMPSHIRE SUPERIOR COURT
MERRIMACK COUNTY
CLERK OF COURT

MOTION FOR COUNSEL TO APPEAR *PRO HAC VICE*

Petitioners Sheldon Holson and Melvin Holson (“Petitioners”), by and through their counsel, Hinckley, Allen & Snyder LLP, hereby move that this Court allow Gerald J. Petros to appear on their behalf with undersigned counsel in the above-captioned matter. In support of this Motion, Petitioners submit as follows:

1. Mr. Petros is a member of the law firm of Hinckley, Allen & Snyder LLP, located at 50 Kennedy Plaza, Suite 1500, Providence, Rhode Island, tel: (401) 274-2000; fax: (401) 277-9600, which also has an office located at 11 South Main Street, Suite 400, Concord, New Hampshire, tel: (603) 225-4334; fax: (603) 224-8350. Christopher H.M. Carter is a member of Hinckley, Allen & Snyder LLP in the firm’s Concord office and is undersigned counsel on this Motion. Petitioners have chosen Mr. Petros to serve as their lead counsel in this case.

2. Mr. Petros was admitted to the Rhode Island Bar in 1983, and at all times has been in good standing since his admission. Mr. Petros also is admitted to practice before the U.S. District Court for the District of Rhode Island.

3. Mr. Petros was admitted to the Bar of the Commonwealth of Massachusetts in 1991, and at all times has been in good standing since his admission. Mr. Petros also is admitted to practice before the U.S. District Court for the District of Massachusetts, the U.S. Court of Appeals for the First Circuit, and the United States Supreme Court. A verified application for admission by Mr. Petros is attached as Exhibit A.

4. Mr. Petros has represented Petitioners in their claims against the Home Insurance Company for over eight years, starting with negotiations with the Home, to filing a complaint in 2002 in Superior Court in Connecticut, through the Proof of Claim filing in this matter. Moreover, Mr. Petros has worked closely with Hinckley, Allen & Snyder in Concord, New Hampshire. For these reasons, Petitioners request that this Court enter an order authorizing Mr. Petros to appear and practice *pro hac vice* in the above-referenced matter, in association with undersigned counsel.

5. Undersigned counsel will remain actively associated with Mr. Petros in this matter, as required by Superior Court Rule 19.

WHEREFORE, Petitioners respectfully request that the Court issue an Order:

- A. Granting this Motion and allow Gerald J. Petros to appear and practice *pro hac vice*; and
- B. Granting such other relief as is just and proper.

Respectfully submitted,

SHELDON HOLSON
MELVIN HOLSON

By their attorneys

Dated: November 7, 2008



Christopher H.M. Carter, Esq. (#12452)
Hinckley, Allen & Snyder LLP
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Concord, NH 03301
Tel: (603) 225-4334
Fax: (603) 224-8350

CERTIFICATE OF SERVICE

I, Christopher H.M. Carter, hereby certify that on this date I caused a copy of the foregoing to be sent, via first class mail, postage pre-paid, to counsel of record.



Christopher H.M. Carter

STATE OF NEW HAMPSHIRE

MERRIMACK, ss

SUPERIOR COURT

2008 NOV -7 A 10: 57

Docket Nos. 03-E-0106

In The Matter of The Liquidation of The Home Insurance Company

**VERIFIED APPLICATION OF GERALD J. PETROS IN
SUPPORT OF PETITIONERS' MOTION FOR ADMISSION *PRO HAC VICE***

I, Gerald J. Petros, state as follows:

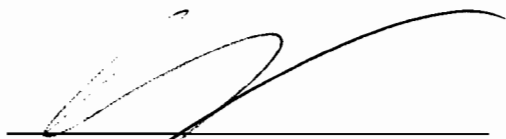
1. I file this Verified Application for admission *pro hac vice* in compliance with New Hampshire Superior Court Rule 19.
2. I respectfully request to be admitted *pro hac vice* in this matter to represent the Petitioners, Sheldon Holson, who has a residential and mailing address of 11 Weatherbell Drive, Norwalk, Connecticut 06851, and Melvin Holson, who has a residential and mailing address of 22 Pent Road, Weston, Connecticut, 06883.
3. I am a member of the law firm of Hinckley, Allen & Snyder LLP, located at 50 Kennedy Plaza, Suite 1500, Providence, Rhode Island, tel: (401) 274-2000; fax: (401) 277-9600, which also has an office located at 11 South Main Street, Suite 400, Concord, New Hampshire, tel: (603) 225-4334; fax: (603) 224-8350. My residential address is 34 Walmsley Lane, Saunderstown, RI 02874.
4. I am a member in good standing in each of the jurisdictions where I am admitted to practice, and I have never been the subject of any disciplinary proceeding.
5. I was admitted to the Rhode Island Bar in 1983. I also am admitted to practice before the U.S. District Court for the District of Rhode Island.

6. I was admitted to the Bar of the Commonwealth of Massachusetts in 1991. I also am admitted to practice before the U.S. District Court for the District of Massachusetts, the U.S. Court of Appeals for the First Circuit, and the United States Supreme Court.

7. I have never been denied admission *pro hac vice* in New Hampshire courts, had admission *pro hac vice* revoked, or been disciplined in any New Hampshire court.

8. At all times in this matter, I will be associated with Christopher H.M. Carter of the law firm of Hinckley, Allen & Snyder LLP.

Signed under the pains and penalties of perjury, this 7th day of November, 2008.



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