

DN
PC

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

2009 NOV 13 A 8:10

Docket No. 03-E-0106

In the Matter of the Liquidation of
The Home Insurance Company

FILED
CLERK OF SUPERIOR COURT
MERRIMACK COUNTY
CONCORD, NH

**ASSENTED-TO MOTION TO PERMIT RICHARD MANCINO, ESQUIRE,
JOSEPH G. DAVIS, ESQUIRE, AND ALBERT P. BEDECARRE, ESQUIRE
TO APPEAR PRO HAC VICE**

Zurich American Insurance Company, Zurich Insurance Company of Illinois, Steadfast Insurance Company, Zurich Insurance Company Ltd., American Guarantee and Liability Insurance Company, American Zurich Insurance Company, and Orange Stone Reinsurance (collectively, "the California Defendants"), by and through their attorneys, Sulloway & Hollis, P.L.L.C., with the concurrence of counsel for the Liquidator and the Commissioner of the New Hampshire Insurance Department, move for the admission *pro hac vice* of Richard Mancino, Esquire, of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019; Joseph G. Davis, Esquire, of Willkie Farr & Gallagher LLP, 1875 K. Street, N.W., Washington, DC 20006; and Albert P. Bedecarre, Quinn Emanuel Urquhart Oliver & Hedges, LLP, 50 California Street, 22nd Floor, San Francisco, California 94111, in accordance with Rule 19 of the Superior Court Rules. In support of this Motion, the California Defendants state as follows:

1. An Affidavit from Attorney Mancino that conforms to the requirements of Superior Court Rule 19 is attached as Exhibit A and submitted in support of this motion.
2. As noted in the Affidavit, Attorney Mancino is a member in good standing of all the Bars to which he has been admitted and has not had any disciplinary proceedings brought against him in this or any other jurisdiction.

3. An Affidavit from Attorney Davis that conforms to the requirements of Superior Court Rule 19 is attached as Exhibit B and submitted in support of this motion.
4. As noted in the Affidavit, Attorney Davis is a member in good standing of all the Bars to which he has been admitted and has not had any disciplinary proceedings brought against him in this or any other jurisdiction.
5. An Affidavit from Attorney Bedecarre that conforms to the requirements of Superior Court Rule 19 is attached as Exhibit C and submitted in support of this motion.
6. As noted in the Affidavit, Attorney Bedecarre is a member in good standing of all the Bars to which he has been admitted and has not had any disciplinary proceedings brought against him in this or any other jurisdiction.
7. Attorneys Mancino, Davis, and Bedecarre will associate themselves with the attorneys of Sulloway & Hollis, P.L.L.C., all of whom are in good standing with the New Hampshire Bar. An attorney from Sulloway & Hollis, P.L.L.C., will appear at all hearings and trial proceedings in this matter.
8. Undersigned counsel sought the assent of counsel for Roger A. Sevigny, both as Insurance Commissioner of the State of New Hampshire and as Liquidator of The Home Insurance Company, and counsel concurs in the relief requested in this Motion.
9. A check in the amount of \$675.00 is being submitted concurrently to cover the application fees required in Superior Court Rule 19(e).

WHEREFORE, the California Defendants respectfully request that this Honorable Court:

- A. Grant this Motion and admit Richard Mancino, Esquire, Joseph G. Davis, Esquire and Albert Bedecarre, Esquire *pro hac vice* as counsel for the California Defendants; and

B. Grant such other and further relief as is just and equitable.


Respectfully submitted,

Zurich American Insurance Company, Zurich
Insurance Company of Illinois, Steadfast Insurance
Company, Zurich Insurance Company Ltd.,
American Guarantee and Liability Insurance
Company, American Zurich Insurance Company,
and Orange Stone Reinsurance

By their Attorneys,


SULLOWAY & HOLLIS, P.L.L.C.

Dated: Nov. 12, 2009

By: 
Martin P. Honigberg, Bar No. 10998
9 Capitol Street, Box 1256
Concord, NH 03302-1256
(603) 224-2341

CERTIFICATE OF SERVICE

I hereby certify that a copy of the within document has been forwarded via first class
mail, postage prepaid, to all on the attached service list.


Martin P. Honigberg, Bar. No. 10998

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106

In the Matter of the Liquidation of
The Home Insurance Company

SERVICE LIST

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

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

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

Gary S. Lee, Esq.
James J. DeCristofaro, Esq.
Kathleen E. Schaaf, Esq.
Morrison & Foerster
1290 Avenue of the Americas
New York, NY 10104-0050

Peter Van Tol, Esq.
Lovells
590 Madison Avenue
New York, New York 10022

Gail M. Goering, Esq.
Adam Goodman, Esq.
Eric Haab, Esq.
Lovells
One IBM Plaza
330 N. Wabash Avenue, Suite 1900
Chicago, IL 60611

Peter G. Callaghan, Esq.
Preti, Flaherty, Beliveau, Pachos & Haley, PLLP
57 North Main Street
P.O. Box 1318
Concord, NH 03302-1318

George T. Campbell, III, Esq.
Robert A. Stein, Esq.
Robert A. Stein & Associates, PLLC
One Barberry Lane
P.O. Box 2159
Concord, NH 03302-2159

David M. Spector, Esq.
Dennis G. LaGory, Esq.
Schiff Hardin LLP
6600 Sears Tower
Chicago, IL 60606

Stephan P. Parks, Esq.
Doreen F. Connor, Esq.
Wiggin & Nouris, P.A.
670 North Commercial Street, Suite 305
P.O. Box 808
Manchester, NH 03105-0808

Michael Cohen, Esq.
Cohen & Buckley, LLP
1301 York road
Baltimore, MD 21093

David H. Simmons, Esq.
Mary Ann Etzler, Esq.
De Beaubien, Knight, Simmons, Mantzaris & Neal, LLP
332 North Magnolia Avenue
P.O. Box 87
Orlando, FL 32801

ADDITIONAL DISTRIBUTION LIST

Dawn S. Pittman, Esq.
Brady R. Dewar, Esq.
Morgan Lewis & Bockius, LLP
One Market, Spear Street tower
San Francisco, CA 94105

Jeffrey W. Moss, Esq.
Morgan Lewis & Bockius, LLP
225 Franklin Street
16th Floor
Boston, MA 02110

Jordan S. Stanzler, Esq.
Stanzler FunderBurk & Castellon, LLP
180 Montgomery Street
Suite 1700
San Francisco, CA 94111

Dean Hansell, Esq.
Dewey & LeBoeuf
333 South Grand Avenue
Suite 2600
Los Angeles, CA 90071-1530

on PC

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106

2009 NOV 13 A 8:10

In the Matter of the Liquidation of
The Home Insurance Company

IN SUPERIOR COURT
MERRIMACK COUNTY
CONCORD, NH

AFFIDAVIT IN SUPPORT OF PRO HAC VICE MOTION

Richard Mancino, Esquire, being first duly sworn, does hereby depose and say as follows:

1. I am a member of the law firm of Willkie Farr & Gallagher LLP, counsel for Zurich American Insurance Company, Zurich Insurance Company of Illinois, Steadfast Insurance Company, Zurich Insurance Company, American Guarantee and Liability Insurance Company, American Zurich Insurance Company, and Orange Stone Reinsurance (collectively, the "California Defendants"). I submit this Affidavit in support of my application for *pro hac vice* admission pursuant to Superior Court Rule 19 of the State of New Hampshire with respect to the above-captioned matter.

2. My residential address is as follows: 95 Horatio Street, #711, New York, New York 10014.

3. My office address is as follows: Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019. My office telephone number is (212) 728-8243.

4. I seek *pro hac vice* admission to represent: Zurich American Insurance Company, Zurich American Insurance Company of Illinois, Steadfast Insurance Company, American Guarantee and Liability Insurance Company, and American Zurich Insurance Company, each of whose business address is 1400 American Lane,

Schaumburg, Illinois 60196 and whose phone number is (847) 605-6000; Zurich Insurance Company Ltd., whose business address is Mythenquai 2, CH-8022, Zurich, Switzerland and whose phone number is +41 (0)44-625-25-25; and Orange Stone Reinsurance, whose business address is 1 Custom House Quay, Dublin 1, Ireland and whose phone number is +353 (0)1-818-9800.

5. I am a member in good standing of the Bars of the following states and courts and was admitted on the following dates: State of New York, 1983; United States Court of Appeals, 2nd Circuit, 1990; United States Court of Appeals, 3rd Circuit, 1990; United States Court of Appeals, 7th Circuit, 2004; United States Court of Appeals, 9th Circuit, 1989; United States District Court, Eastern District of New York, 1983; United States District Court, Southern District of New York, 1983; United States District Court, Western District of New York, 2008.

6. I have never (a) been denied admission *pro hac vice* in New Hampshire, (b) had admission *pro hac vice* revoked in New Hampshire, or (c) otherwise been disciplined or sanctioned by any court of New Hampshire.

7. I am in good standing and eligible to practice in all of the Courts listed in Paragraph 5 above, and I have never had any disciplinary proceedings brought against me in any other jurisdiction.

8. I have never been held in contempt or otherwise sanctioned by any court.

9. I have not filed an application to appear *pro hac vice* in New Hampshire in the last two years.

10. I am associated with Martin P. Honigberg, Esquire of the law firm of Sulloway & Hollis, P.L.L.C., 9 Capitol Street, Box 1256, Concord, New Hampshire

03302-1256, the attorneys of records for the California Defendants. Attorney Honigberg will be present at all proceedings before the Court in this matter.

Dated: 11/09/09

Richard Mancino
Richard Mancino, Esquire

~~STATE OF NEW YORK~~
New York, SS

Subscribed and sworn to before me this 9th day of November 2009.

Stacy Y. Blanco

Notary Public

My Commission Expires: May 19, 2012

STACY Y. BLANCO
Notary Public, State of New York
No. 01BL6187197
Qualified in New York County
Commission Expires May 19, 2012

ON PC

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106

In the Matter of the Liquidation of
The Home Insurance Company

AFFIDAVIT IN SUPPORT OF *PRO HAC VICE* MOTION

Joseph G. Davis, Esquire, being first duly sworn, does hereby depose and say as follows:

1. I am a member of the law firm of Willkie Farr & Gallagher LLP, counsel for Zurich American Insurance Company, Zurich Insurance Company of Illinois, Steadfast Insurance Company, Zurich Insurance Company, American Guarantee and Liability Insurance Company, American Zurich Insurance Company, and Orange Stone Reinsurance (collectively, the "California Defendants"). I submit this Affidavit in support of my application for *pro hac vice* admission pursuant to Superior Court Rule 19 of the State of New Hampshire with respect to the above-captioned matter.

2. My residential address is as follows: 311 North Van Buren Street, Falls Church, Virginia 22046.

3. My office address is as follows: Willkie Farr & Gallagher LLP, 1875 K Street, N.W., Washington, DC 20006. My office telephone number is (202) 303-1131.

4. I seek *pro hac vice* admission to represent: Zurich American Insurance Company, Zurich American Insurance Company of Illinois, Steadfast Insurance Company, American Guarantee and Liability Insurance Company, and American Zurich Insurance Company, each of whose business address is 1400 American Lane, Schaumburg, Illinois 60196 and whose phone number is (847) 605-6000; Zurich

Insurance Company Ltd., whose business address is Mythenquai 2, CH-8022, Zurich, Switzerland and whose phone number is +41 (0)44-625-25-25; and Orange Stone Reinsurance, whose business address is 1 Custom House Quay, Dublin 1, Ireland and whose phone number is +353 (0)1-818-9800.

5. I am a member in good standing of the Bars of the following states and courts and was admitted on the following dates: State of California, 1992; District of Columbia, 1994; United States Supreme Court, 1995; United States Court of Appeals, 10th Circuit, 1993; United States Court of Appeals, 5th Circuit, 1992; United States Court of Appeals, D.C. Circuit, 2001; United States District Court, District of Columbia, 1995.

6. I have never (a) been denied admission *pro hac vice* in New Hampshire, (b) had admission *pro hac vice* revoked in New Hampshire, or (c) otherwise been disciplined or sanctioned by any court of New Hampshire.

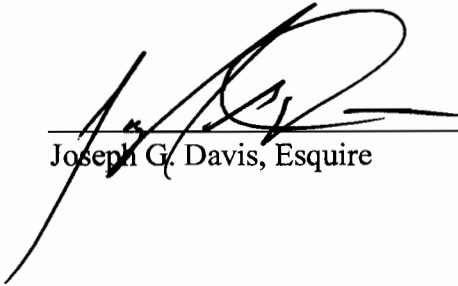
7. I am in good standing and eligible to practice in all of the Courts listed in Paragraph 5 above, and I have never had any disciplinary proceedings brought against me in any other jurisdiction.

8. I have never been held in contempt or otherwise sanctioned by any court.

9. I have not filed an application to appear *pro hac vice* in New Hampshire in the last two years.


10. I am associated with Martin P. Honigberg, Esquire of the law firm of Sulloway & Hollis, P.L.L.C., 9 Capitol Street, Box 1256, Concord, New Hampshire 03302-1256, the attorneys of records for the California Defendants. Attorney Honigberg will be present at all proceedings before the Court in this matter.

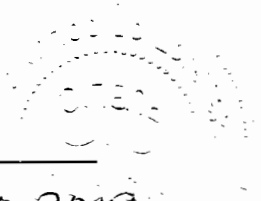
Dated: 11/9/09


Joseph G. Davis, Esquire

DISTRICT OF COLUMBIA
_____, SS

Subscribed and sworn to before me this 9th day of November 2009.


Notary Public
My Commission Expires: April 30, 2013



Ann M. Staron
Notary Public, District of Columbia
My Commission Expires April 30, 2013

ON PC

Exhibit C

STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 03-E-0106

In the Matter of the Liquidation of
The Home Insurance Company

AFFIDAVIT IN SUPPORT OF PRO HAC VICE MOTION

Albert P. Bedecarre, Esquire, being first duly sworn, does hereby depose and say as follows:

1. I am a member of the law firm of Quinn Emanuel Urquhart Oliver & Hedges, LLP, counsel for Zurich American Insurance Company, Zurich Insurance Company of Illinois, Steadfast Insurance Company, Zurich Insurance Company, American Guarantee and Liability Insurance Company, American Zurich Insurance Company, and Orange Stone Reinsurance (collectively, the "California Defendants"). I submit this Affidavit in support of my application for *pro hac vice* admission pursuant to Superior Court Rule 19 of the State of New Hampshire with respect to the above-captioned matter.

2. My residential address is as follows: 1490 32nd Avenue, San Francisco, California 94122.

3. My office address is as follows: 50 California Street, 22nd Floor, San Francisco, California 94111. My office telephone number is (415) 875-6600.

4. I seek *pro hac vice* admission to represent: Zurich American Insurance Company, Zurich American Insurance Company of Illinois, Steadfast Insurance Company, American Guarantee and Liability Insurance Company, and American Zurich Insurance Company, each of whose business address is 1400 American Lane,

Schaumburg, Illinois 60196 and whose phone number is (847) 605-6000; Zurich Insurance Company Ltd., whose business address is Mythenquai 2, CH-8022, Zurich, Switzerland and whose phone number is +41 (0)44-625-25-25; and Orange Stone Reinsurance, whose business address is 1 Custom House Quay, Dublin 1, Ireland and whose phone number is +353 (0)1-818-9800.

5. I am a member in good standing of the Bars of the following states and courts and was admitted on the following dates: State of California, [1990]; United States Court of Appeal for the Ninth Circuit [1990]; United States District Court for the Northern District of California [1990]; United States District Court for the Central District of California [1990]; United States District Court for the Eastern District of California [1990]; United States District Court for the Southern District of California [1990]; and United States District Court for the Western District of Wisconsin [2006].

6. I have never (a) been denied admission *pro hac vice* in New Hampshire, (b) had admission *pro hac vice* revoked in New Hampshire, or (c) otherwise been disciplined or sanctioned by any court of New Hampshire.

7. I am in good standing and eligible to practice in all of the Courts listed in Paragraph 5 above, and I have never had any disciplinary proceedings brought against me in any other jurisdiction.

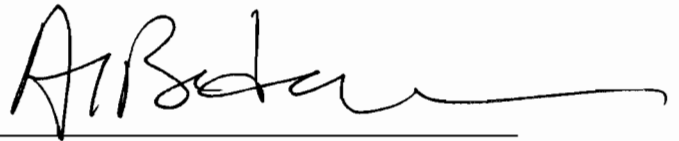
8. I have never been held in contempt or otherwise sanctioned by any court.

9. I have not filed an application to appear *pro hac vice* in New Hampshire in the last two years.

10. I am associated with Martin P. Honigberg, Esquire of the law firm of Sulloway & Hollis, P.L.L.C., 9 Capitol Street, Box 1256, Concord, New Hampshire

03302-1256, the attorneys of records for the California Defendants. Attorney Honigberg will be present at all proceedings before the Court in this matter.

Dated: November 6, 2009

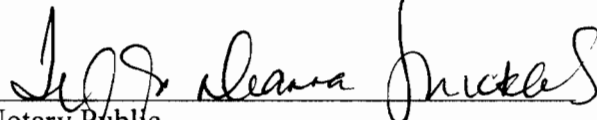


Albert P. Bedecarre, Esquire

SAN FRANCISCO, CA

California, SS

Subscribed and sworn to before me this 6th day of November 2009.



Notary Public

My Commission Expires: May 13, 2010

