

**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 Paul W. Kalish, Esq., Ellen M. Farrell, Esq., and Timothy E. Curley, Esq., all of the law firm of Crowell & Moring, LLP, 101 Pennsylvania Avenue, NW, Washington, DC 20004-2595. In support of this motion, I state as follows:

1. As set forth in greater details in the supporting affidavits, Paul W. Kalish, Esq., is a member of the firm of Crowell & Moring, LLP, 1001 Pennsylvania Avenue, NW, Washington, DC 20004-2595; telephone 202-624-2500. He is licensed to practice before the Bars of the District of Columbia (1988) and Maryland (1986). He has also been admitted to practice before the United States District Court for the District of Columbia and the United States Court of Appeals for the District of Columbia.

2. Ellen M. Farrell, Esq. is of counsel with the law firm of Crowell & Moring. She has been licensed to practice in the District of Columbia (1997), and is in good standing with, but an inactive member of, the North Carolina bar since 1994.

3. Timothy E. Curley is an associate with the law firm of Crowell & Moring. He is licensed to practice law in the District of Columbia (2000) and New York (1995). Additionally, he has been admitted to practice before the United States District Court for the District of

Columbia (2002), the United States Circuit Courts of Appeals for the First Circuit (2006), the Court of Appeals for the Armed Forces (1998) and the United States Supreme Court (2000).

4. Each of these attorneys are members in good standing and eligible to practice in the jurisdictions and courts to which they has been admitted.

5. None of them are currently suspended or disbarred in any jurisdiction and are not aware of any pending disciplinary matter against them.

6. I will be actively associated with Attorneys Kalish, Farrell and Curely during the pendency of this matter, and I, or a member of my firm, will be present at all hearings in this matter.

7. Liquidator's counsel concurs 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,

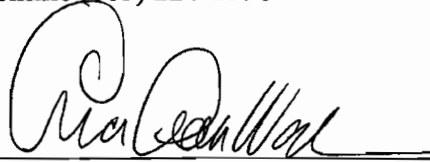
CENTURY INDEMNITY COMPANY,  
ACE PROPERTY & CASUALTY INSURANCE  
COMPANY, PACIFIC EMPLOYERS  
INSURANCE COMPANY AND ACE  
AMERICAN REINSURANCE COMPANY

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: March 18, 2010

By



Lisa Snow Wade (Bar #5595)

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 18<sup>th</sup> day of March 2010, I have caused a copy of the attached document to be forwarded by US Mail to the persons listed on the attached service list.



Lisa Snow Wade

**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**

**AFFIDAVIT OF PAUL W. KALISH, ESQ.**

Paul W. Kalish, Esquire, having been duly sworn, deposes and says:

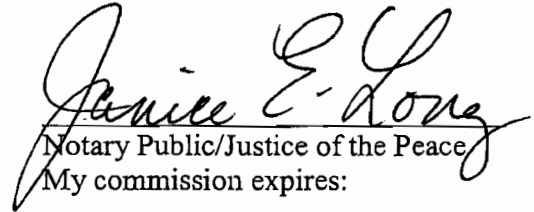
1. My name is Paul W. Kalish, and I am a member of the law firm of Crowell & Moring LLP, 1001 Pennsylvania Avenue, N.W., Washington, DC 20004-2595.
2. I am licensed to practice law in the District of Columbia (1988) and Maryland (1986). Additionally, I have been admitted to practice before the United States District Court for the District of Columbia and the United States Court of Appeals for the District of Columbia.
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.

Dated: March 17, 2010

  
Paul W. Kalish

DISTRICT OF COLUMBIA

On this 17<sup>th</sup> day of March, 2010, Paul W. Kalish personally appeared before me and made an oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.

  
Notary Public/Justice of the Peace  
My commission expires:

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**Janice E. Long**  
Notary Public, District of Columbia  
My Commission Expires 10/1/2010

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Docket No. 03-E-0106  
In the Matter of the Liquidation of  
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AFFIDAVIT OF ELLEN M. FARRELL, ESQ.

Ellen M. Farrell, Esquire, having been duly sworn, deposes and says:

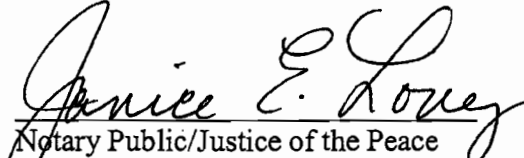
1. My name is Ellen M. Farrell, and I am of counsel with the law firm of Crowell & Moring LLP, 1001 Pennsylvania Avenue, N.W., Washington, DC 20004-2595.
2. I have been licensed to practice law in the District of Columbia since 1997, and I was licensed to practice law in the State of North Carolina in 1994.
3. I am a member in good standing and eligible to practice in the District of Columbia. I am also a member in good standing with the North Carolina Bar, but my membership is inactive.
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.

Dated: March 16, 2010

  
Ellen M. Farrell

DISTRICT OF COLUMBIA

On this 16<sup>th</sup> day of March, 2010, Ellen M. Farrell 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.

  
Notary Public/Justice of the Peace  
My commission expires:

**Janice E. Long**  
Notary Public, District of Columbia  
My Commission Expires 10/1/2010

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

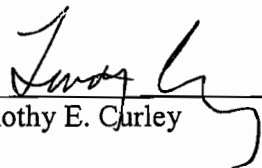
Docket No. 03-E-0106  
In the Matter of the Liquidation of  
The Home Insurance Company

AFFIDAVIT OF TIMOTHY E. CURLEY, ESQ.

Timothy Curley, Esquire, having been duly sworn, deposes and says:

1. My name is Timothy Curley, and I am an associate with the law firm of Crowell & Moring LLP, 1001 Pennsylvania Avenue, N.W., Washington, DC 20004-2595.
2. I am licensed to practice law in the District of Columbia (2000) and New York (1995). Additionally, I have been admitted to practice before the United States District Court for the District of Columbia (2002), the United States Circuit Courts of Appeals for the First (2006), the Court of Appeals for the Armed Forces (1998), and the United States Supreme Court (2000).
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.

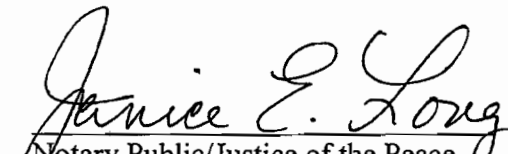
Dated: March 16, 2010

  
\_\_\_\_\_  
Timothy E. Curley



DISTRICT OF COLUMBIA

On this 16<sup>th</sup> day of March, 2010, Timothy Curley personally appeared before me and made an oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.

  
Notary Public/Justice of the Peace  
My commission expires:

**Janice E. Long**  
Notary Public, District of Columbia  
My Commission Expires 10/1/2010

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

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