

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS

SUPERIOR COURT

Docket No. 217-2003-Eq-00106

**In the Matter of the Liquidation of
The Home Insurance Company**

MOTION TO ADMIT COUNSEL *PRO HAC VICE*

NOW COMES Eric A. Smith, of Rackemann, Sawyer & Brewster, a member in good standing of the New Hampshire Bar and admitted to practice before this Court, and moves this Court for an order admitting Margaret A. Capp, of the law firm Rackemann, Sawyer & Brewster, 160 Federal Street, Boston, Massachusetts 02110-1700, to appear before this Court *pro hac vice* on behalf of John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator (“Liquidator”) of The Home Insurance Company (“Home”), in the above-captioned matter.

In support of this Motion, I state the following:

1. I am one of the counsel for the Liquidator in this matter.
2. Margaret A. Capp, Esquire, is admitted to practice before the Courts of the State Bar of Massachusetts (admitted November 14, 2017), and the United States District Court for the District of Massachusetts (admitted February 13, 2018). See Verified Application of Margaret A. Capp to Appear *Pro Hac Vice*, attached hereto as Exhibit A.
3. During this matter, Margaret A. Capp will be associated with me in representing the Liquidator, and I will be present at any trial or hearing in this matter.
4. In view of the nature of this proceeding for the liquidation of Home and the number of interested persons involved, the Liquidator has not sought assent from interested persons.

WHEREFORE, for the reasons set forth above, Eric A. Smith respectfully requests that this Honorable Court:

- A. Grant the within Motion and admit Margaret A. Capp to practice before this Court for the purposes of this action, on behalf of John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator of The Home Insurance Company.
- B. Grant such other relief as this Court deems just and proper.

Respectfully submitted,

JOHN R. ELIAS, INSURANCE
COMMISSIONER OF THE STATE OF
NEW HAMPSHIRE, SOLELY AS
LIQUIDATOR OF THE HOME
INSURANCE COMPANY,

By his attorneys,

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Dated: December 12, 2019

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served on December 12, 2019 via first-class mail, postage prepaid, to all persons on the attached service list:



Eric A. Smith
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THE STATE OF NEW HAMPSHIRE

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Docket No. 217-2003-EQ-00106

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