### 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 FOR COUNSEL TO APPEAR PRO HAC VICE

MW Custom Papers LLC ("MWCP"), successor to the Mead Corporation, hereby moves to permit Attorney Jessica L.G. Moran of the law firm of K&L Gates LLP to appear *pro hac vice* before the Court with undersigned counsel pursuant to Rule 19 of the New Hampshire Superior Court Rules. In support of this motion, MWCP states as follows:

- 1. The undersigned is a member of the Bar of this Court in good standing and is actively associated with Attorney Moran in this particular matter.
- 2. Attached hereto as Exhibit A is the Verified Application of Jessica L.G. Moran setting forth the required information pursuant to N.H. Super. Ct. R. 19(b).
- 3. Pursuant to N.H. Super Ct. R. 11(c), undersigned counsel has contacted counsel for the Liquidator and the Liquidator assents to this motion. Due to the nature of this matter, and the number of interested persons involved, undersigned counsel has not sought assent from any other interested persons.
- 4. No memorandum of law is necessary as the relief sought is within the sound discretion of this Honorable Court.

WHEREFORE, MWCP respectfully requests that this Court permit Attorney Moran of the law firm of K&L Gates LLP to participate before the Court in this action and grant such other relief as the Court deems just and proper.

Respectfully submitted,

MW Custom Papers LLC

By its attorney

Christopher J. Valente (N.H. Bar No. 20145)

christopher.valente@klgates.com

K&L GATES LLP

State Street Financial Center

One Lincoln Street Boston, MA 02111

T: 617.261.3100 F: 617.261.3175

Dated: January 28, 2020

### **CERTIFICATE OF SERVICE**

I, Christopher J. Valente, hereby certify that a copy of the foregoing was served on all parties by first-class U.S. mail, postage prepaid on this 28th day of January, 2020.

Christopher J. Valente

## **EXHIBIT A**

### THE STATE OF NEW HAMPSHIRE

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SUPERIOR COURT

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#### **AFFIDAVIT**

COMMONWEALTH OF PENNSYLVANIA	)
COUNTY OF ALLEGHENY	)ss )

- I, Jessica L.G. Moran, being of lawful age and after being duly sworn upon my oath, depose and state:
  - 1. I am an attorney duly admitted to practice law in the Commonwealth of Pennsylvania.
- 2. I am an associate in the law firm of K&L Gates, LLP with a business address, telephone number, facsimile number, and email address as follows: K&L Gates, LLP, 210 Sixth Avenue, Pittsburgh, Pennsylvania 15222; Telephone (412) 355-6344; Facsimile (412) 355-6501; Email address: joseph.safar@klgates.com, and residence as follows: 300 Liberty Avenue, #208, Pittsburgh, Pennsylvania 15222.
- 3. I am duly licensed by, and in good standing with, the Commonwealth of Pennsylvania and its courts, and the U.S. District Court for the Western District of Pennsylvania.
- 4. If admitted, I would be participating in the case entitled In the Matter of the Liquidation of the Home Insurance Company, Docket No. 217-2003-EQ-00106.

5. I have not participated, appeared, or sought to appear in any other State of New Hampshire court in the past two years.

6. I have not been the subject of any disciplinary action by the Pennsylvania Committee on Professional Conduct, or any of the aforementioned courts during my licensure as an attorney.

7. I have never been denied admission to the courts of any State or to any Federal court.

8. I will be associated with Christopher J. Valente, K&L Gates LLP, New Hampshire Bar No. 20145, One Lincoln Street, Boston, MA 02111, Telephone (617) 951-9071, who is an attorney duly licensed in the State of New Hampshire.

FURTHER AFFIANT SAYETH NAUGHT.

Jessica L.G. Moran

SUBSCRIBED AND SWORN to before me, a notary public, this 27th day of January, 2020.

My commission expires:

Notary Public

4922

Commonwealth of Pennsylvania - Notary Seal Stacy Heath, Notary Public Allegheny County My commission expires April 9, 2022 Commission number 1068958

Member, Pennsylvania Association of Notaries