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 PETER B. STEFFEN AS COUNSEL PRO HAC VICE

Zurich Insurance plc, German Branch and Württembergische Versicherung AG ("Objecting Creditors"), by and through their New Hampshire counsel, McLane Middleton, Professional Association, respectfully move this Court for admission of Peter B. Steffen pro hac vice, as co-counsel for the purpose of representing the Objecting Creditors in this action. In support of this Motion, the Objecting Creditors state as follows:

- 1. Peter B. Steffen is a partner at the law firm of Freeborn & Peters LLP, 311 South Wacker Drive, Suite 3000, Chicago, Illinois 60606. His residential address is 6899 N. Wildwood Ave., Chicago 60646. His business phone number is (312) 360-6000. His email is psteffen@freeborn.com.
- Attorney Steffen is and has been a member in good standing of the bar of the State of Illinois since November 8, 2001. In addition, Attorney Steffen is and has been a member in good standing of the United States District Court for the Northern District of Illinois since 2001.
- 3. Attorney Steffen has not been denied admission pro hac vice in this State, has not had admission pro hac vice revoked in this State, nor has he been otherwise formally disciplined or sanctioned by any court in this State.

JOHN C. KISSING

- 4. No formal, written disciplinary proceeding had been brought against him in any jurisdiction. He has not been held in contempt or otherwise sanctioned by any court.
- Attorney Steffen has not filed an application to appear pro hac vice in New Hampshire within the preceding two years.
- 6. The below-listed attorneys will serve as co-counsel to Attorney Steffen and will be present at any trial or hearing, unless excused by the Court:

Attorney Mark C. Rouvalis (N.H. Bar No. 6565) of McLane Middleton, Professional Association, located at 900 Elm Street, 10th Floor, Manchester, NH 03101, (603) 628-1329;

Attorney Steven J. Dutton (N.H. Bar No. 17101) of McLane Middleton, Professional Association, located at 900 Elm Street, 10th Floor, Manchester, NH 03101, (603) 628-1379; and

Attorney Viggo C. Fish (Bar No. 267579) of McLane Middleton, Professional Association, located at 11 South Main Street, Suite 500, Concord, NH 03301, (603) 230-4412.

7. Pursuant to Superior Court Rule 19, the Verified Application of Peter B. Steffen in support of this Motion to Admit Counsel *Pro Hac Vice* has been filed with this Motion.

WHEREFORE, the Objecting Creditors respectfully request that this Court

- A. Grant this Motion to Admit Peter B. Steffen as Counsel Pro Hac Vice; and
- B. Grant such further relief as this Court deems just and reasonable.

Respectfully submitted,

ZURICH INSURANCE PLC GERMAN BRANCH AND WUERTTEMBERGISCHE VERSICHERUNG,

By their Attorneys,

McLANE MIDDLETON,

PROFESSIONAL ASSOCIATION

Dated: November 22, 2019

By: Vigge for: Mark (. Rowalls Mark C. Royanis (Bar No. 6565)

> Vegar () for: Mark Rouvalis

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Certificate of Service

I hereby certify that a copy of the foregoing Zurich Insurance plc German Branch's and Württembergische Versicherung AG's Motion to Admit Peter B. Steffen as Counsel *Pro Hac Vice* was sent this th day of November 22, 2019 by first class mail, postage prepaid to all persons on the attached service list.

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