

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

2023 SEP 22 12:09

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 Michael K. Robles, Esq., of the law firm of Crowell & Moring, LLP to represent Century Indemnity Company (“Century”), ACE Property & Casualty Insurance Company (“ACE P&C”), Pacific Employers Insurance Company (“PEIC”), and ACE American Reinsurance Company (“AARE”) (collectively the “ACE Companies”). In support of this motion, I state as follows:

1. As set forth in greater detail in the supporting affidavit, Michael K. Robles is a partner at the firm of Crowell & Moring, LLP, 590 Madison Avenue, 20th Floor, New York, New York 10022. His telephone number is 212-803-4035.
2. Mr. Robles is a member in good standing of the Bar of the State of New York (1999), and admitted and eligible to practice before the United States Court of Appeals for the Second Circuit (2011), United States District Court for the Southern District of New York (1999), and United States District Court for the Western District of New York (2015).
4. No disciplinary sanction was ever imposed on Mr. Robles, nor was any investigation of his conduct instituted. Mr. Robles is not currently suspended or disbarred in any jurisdiction and is not aware of any pending disciplinary matter against him.

5. I will be actively associated with Attorney Robles during the pendency of this matter, and I, or a member of my firm, will be present at all hearings in this matter.

6. The 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,


[Respectfully submitted,

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

By their attorneys,

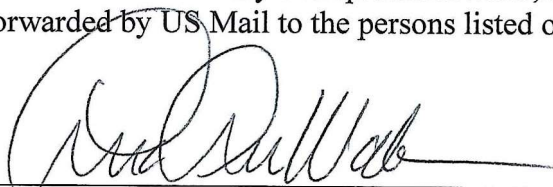
ORR & RENO, P.A.
One Eagle Square
P.O. Box 3550
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Telephone (603) 224-2381
Facsimile (603) 224-2318

Date: September 18, 2023

By 
Lisa Snow Wade (Bar #5595)

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, Esq., hereby certify that on this 23rd day of September 2023, 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

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AFFIDAVIT OF MICHAEL K. ROBLES, ESQ.

Michael K. Robles, Esquire, having been duly sworn, deposes and says:

1. My name is Michael K. Robles, and I am a partner with the law firm of Crowell & Moring LLP, 590 Madison Avenue, 20th Floor, New York, New York 10022. My telephone number is 212-803-4035.

2. I am member in good standing of the bar of the State of New York (1999), and admitted and eligible to practice before the United States Court of Appeals for the Second Circuit (2011), United States District Court for the Southern District of New York (1999), and United States District Court for the Western District of New York (2015).

3. No disciplinary sanction was ever imposed on me, nor was any investigation of my conduct instituted. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.

4. I am familiar with the Rules of the Superior Court of the State of New Hampshire.

Dated: September 15, 2023

Michael Robles



09/15/2023

12:51 PM MDT

Michael K. Robles, Esq.

STATE OF COLORADO

COUNTY OF DOUGLAS

On this 15th day of September, 2023, Michael K. Robles 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.

Barbara L. Werner
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19994029042
MY COMMISSION EXPIRES November 9, 2027

Barbara Werner



09/15/2023

12:52 PM MDT

Certified Remote Notary Public

My commission expires: 11/09/2027

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

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