

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

BEFORE THE COURT-APPOINTED REFEREE
IN RE THE LIQUIDATION OF THE HOME INSURANCE COMPANY
DISPUTED CLAIMS DOCKET

SUPERIOR COURT

2016 MAY 9 AM 8 33

In Re Liquidator Number: 2015-HICIL-60Proof of Claim Number: INSU240739-01Claimant Name: Bridgestone Americas Tire Operations, LLCMOTION TO ADMIT PRO HAC VICE
WITH ASSENT OF THE LIQUIDATOR

NOW COMES Defendant, Bridgestone Americas Tire Operations, LLC, formerly known as The Firestone Tire & Rubber Co. ("Bridgestone"), by and through its attorneys, Wadleigh, Starr & Peters, PLLC, and moves as follows:

1. Bridgestone requests permission for Attorney Joseph Z. Czerwien to represent it pro hac vice in the above-captioned matter. See N.H. R. Civ. P. 19(a). Attorney Czerwien will associate with Attorney Robert E. Murphy, Jr. throughout this litigation.

2. As set forth in the attached affidavit, Attorney Czerwien has been a member in good standing of the Bar of the State of Ohio and the United States District Court for the Northern District of Ohio since 2015. His business address is Jones Day, North Point, 901 Lakeside Avenue, Cleveland Ohio, 44114-1190, telephone (216) 586-3939.

3. The application fees specified in Superior Court Rule (Civ.) 19(e) is submitted herewith.

4. Eric A. Smith, Esq., counsel to the Liquidator, does assent to the relief sought herein. See N.H. R. Civ. P. 11(c).

WHEREFORE, Defendant Bridgestone Americas Tire Operations, LLC, respectfully requests that this Court:


- A. Grant the above-captioned Pro Hac Vice Motion;
- B. Grant such other and further relief as may be just and proper.

Respectfully submitted,

BRIDGESTONE AMERICAS TIRE
OPERATIONS, LLC

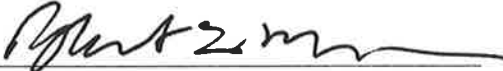
By its attorneys,
WADLEIGH, STARR & PETERS, PLLC

Dated: May 5, 2016

By 
Robert E. Murphy, Jr., Esq., NH Bar 1848
95 Market Street
Manchester, NH 03101
(603) 669-4140
rmurphy@wadleighlaw.com

CERTIFICATE OF SERVICE

I hereby certify that I sent a copy of the foregoing to Eric A. Smith, Esq., J Christopher Marshall, Esq., and the attached service list.


Robert E. Murphy, Jr., Esq.

THE STATE OF NEW HAMPSHIRE

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In Re Liquidator Number: 2015-HICIL-60
Proof of Claim Number: INSU240739-01
Claimant Name: Bridgestone Americas Tire Operations, LLC

Pro Hac Vice Affidavit of Joseph Z. Czerwien

I, Joseph Z. Czerwien, duly sworn, hereby state under oath as follows:

1. I am an associate in the law firm of Jones Day.
2. My business address is North Point, 901 Lakeside Avenue, Cleveland, Ohio 44114-1190.
3. My residence address is 22396 Parkedge Circle, Fairview Park, Ohio 44126.
4. I seek pro hac admission to represent Plaintiff Bridgestone Americas Tire Operations, LLC, formerly known as The Firestone Tire & Rubber Co. ("Bridgestone") in the above-captioned matter. Bridgestone's address is 535 Marriott Drive, Nashville, Tennessee 37214, and its phone number is (615) 937-1000.
5. I am admitted to the following courts:

Supreme Court of Ohio 2015
U.S.D.C., Northern District of Ohio 2015
6. I have never been denied pro hac vice admission in this state.
7. I have never had pro hac vice admission revoked in this state.
8. I have never been formally disciplined or sanctioned by any court in this state.

9. No formal, written disciplinary proceeding has ever been brought against me by any disciplinary authority in any other jurisdiction within the last five years.

10. I have never been formally held in contempt or otherwise sanctioned by any court in a written order in the last five years for disobedience to its rules or orders.

11. I have not sought pro hac vice admission in this state within the last two years.

12. Pursuant to N.H. R. Civ. P. 19(b)(8), I will associate with Robert E. Murphy, Jr. throughout the pendency of this proceeding. I have been informed that Attorney Murphy is an active member of the New Hampshire bar, number 1848, in good standing, that he is a partner at Wadleigh, Starr, & Peters, P.L.L.C., and that his business address is 95 Market Street, Manchester, New Hampshire 03101.

Dated: 5-2-2016

Joseph Z. Czerwien
Joseph Z. Czerwien

STATE OF OHIO

SS:

COUNTY OF CUYAHOGA

Subscribed and sworn to before me this 2 day of May, 2016.



JANET S. BULESKI
NOTARY PUBLIC
FOR THE
STATE OF OHIO
My Commission Expires
August 13, 2016

Janet S. Buleski
Notary Public

SERVICE LIST

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<p>Steven J. Lauwers, Esq. Michael S. Lewis Rath Young Pignatelli One Capital Plaza Concord, NH 03302-1500</p>	
<p>Gary S. Lee, Esq. James J. DeCristofaro, Esq. Kathleen E. Schaaf, Esq. Morrison & Foerster 1290 Avenue of the Americas New York, New York 10104-0050</p>	
<p>David H. Simmons, Esq. Mary Ann Etzler, Esq. Daniel J. O'Malley, Esq. deBeaubien, Kinght, Simmons, Mantzaris & Neal, LLP 332 North Magnolia Avenue PO Box 87 Orlando, FL 32801</p>	