

THE STATE OF NEW HAMPSHIRE
BEFORE THE COURT APPOINTED REFEREE
IN THE MATTER OF THE LIQUIDATION OF THE HOME INSURANCE COMPANY
DISPUTED CLAIMS DOCKET

In re Liquidator Number: 2019-HICIL-62
Proof of Claim Numbers: INSU703957-1 and INSU703968
Claimant Name: PolyOne Corporation

VERIFIED APPLICATION OF MARGARET A. CAPP
TO APPEAR *PRO HAC VICE*

I, Margaret A. Capp, respectfully submit this Verified Application to appear as counsel for John R. Elias, Insurance Commissioner of the State of New Hampshire, as Liquidator of The Home Insurance Company in this matter, pursuant to Superior Court Rule 19, and, in support thereof, I represent the following:

1. My residential address is 85 Seaport Boulevard, Unit 1107, Boston, Massachusetts 02210, and my business address is 160 Federal Street, Boston, Massachusetts 02110-1700. My telephone number is 617-951-1142 and my e-mail is mcapp@rackemann.com.

2. I am admitted to practice law in the following courts and for the periods specified:

| <u>Court:</u> | <u>Date Admitted:</u> |
|---|-----------------------|
| Massachusetts | 11/14/2017 |
| The U.S. District Court for the District of Massachusetts | 02/13/2018 |

3. I have not been denied admission *pro hac vice* in the State of New Hampshire, I have not had a *pro hac vice* admission revoked in the State of New Hampshire, and I have not been disciplined or sanctioned by any court in the State of New Hampshire.

4. No formal, written disciplinary proceeding has been brought against me by any disciplinary authority in any other jurisdiction within the last five years.
5. I have not been held in contempt or otherwise sanctioned by any court in a written order in the last five years for disobedience of its rules or orders.
6. I have not filed an application to appear *pro hac vice* in the State of New Hampshire within the preceding two years, except for the application to appear *pro hac vice* in the Home liquidation itself (Docket No. 217-2003-EQ-00106) being filed at the same time as this motion.
7. Eric A. Smith, Esquire, Rackemann, Sawyer & Brewster, 160 Federal Street, Boston, Massachusetts 02110-1700, NH Bar No. 16952, is an active member in good standing of the Bar of the State of New Hampshire, who will be associated with me and present at any trial or hearing in this matter.

Signed under the pains and penalties of perjury, this 12th day of December, 2019.


Margaret A. Capp

COMMONWEALTH OF MASSACHUSETTS

Suffolk County, MA

On this 12th day of December, 2019, before me, the undersigned notary public, personally appeared Margaret A. Capp, and proved to me through satisfactory evidence of identification, which was my personal knowledge of her identity, to be the person whose name is signed on the preceding document, and acknowledged to me that she signed it voluntarily for its stated purpose.

Notary Public: *Laurie O. Thwaites*
Printed Name: **LAURIE O. THWAITES**
My Commission Expires: **Notary Public
COMMONWEALTH OF MASSACHUSETTS
My Commission Expires
May 7, 2021**

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing document was served on December 12, 2019 by email on counsel for PolyOne Corporation and Goodrich Corporation.

Eric A. Smith

Eric A. Smith

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

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Proof of Claim Number: INSU703957-01 and
INSU703968
Claimant Name: PolyOne Corporation

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