

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

In re Liquidation Number: 2015-HICIL-60 Bridgestone Americas
Tire Operations, LLC
Proof of Claim No.: INSU240739-01
Claimant Name: Bridgestone Americas Tire Operations, LLC

MOTION 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 Attorneys Steven E. Sigalow and Mark J. Andreini to represent it pro hac vice in the above-captioned matter. See N.H. R. Civ. P. 19(a). Attorneys Sigalow and Andreini will associate with Attorney Robert E. Murphy, Jr. throughout this litigation.

2. As set forth in the attached affidavits, Attorney Sigalow has been a member in good standing of the Bar of the State of Ohio since 1975. Attorney Andreini has been a member in good standing of the Bar of the State of Ohio since 1995. Their 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) for each applicant is submitted herewith.

4. Eric A. Smith, Esq., counsel to the Liquidator, assents 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: September 8, 2015

By /s/Robert E. Murphy, Jr.
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 on this 8th day of September, 2015, to Eric A. Smith, Esq.

/s/Robert E. Murphy, Jr.
Robert E. Murphy, Jr., Esq.

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In The Matter Of The Liquidation Of
The Home Insurance Company

Docket No. 03-E-0106

Proof of Claim No.: INSU240739-01

Pro Hac Vice Affidavit of Steven E. Sigalow

I, Steven E. Sigalow, duly sworn, hereby state under oath as follows:

1. I am a partner 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 695 Crystal Lake Road, Akron, Ohio 44333.
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 the United States 1993
Supreme Court of Ohio 1975
U.S. Court of Appeals, Fourth Circuit 1992
U.S. Court of Appeals, Sixth Circuit 1983
U.S.D.C., Northern District of Ohio 1976
U.S.D.C., Southern District of Ohio 2008
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.

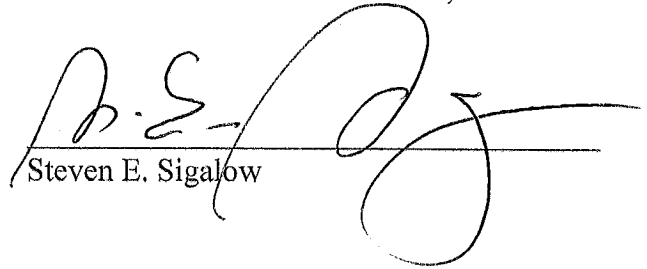
9. No formal, written disciplinary proceeding has ever been brought against me by any disciplinary authority in any other jurisdiction within the last five years.

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.

Dated: 8-3-15

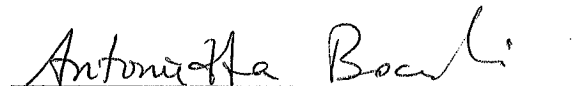

Steven E. Sigalow

STATE OF OHIO

SS:

COUNTY OF CUYAHOGA

Subscribed and sworn to before me this 3rd day of August, 2015.


Notary Public

ANTONIETTA BOCCARDI
NOTARY PUBLIC • STATE OF OHIO
My commission expires Dec. 11, 2017

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

In The Matter Of The Liquidation Of
The Home Insurance Company

Docket No. 03-E-0106

Proof of Claim No.: INSU240739-01

Pro Hac Vice Affidavit of Mark J. Andreini

I, Mark J. Andreini, duly sworn, hereby state under oath as follows:

1. I am a partner 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 3250 Aberdeen Road, Shaker Heights, Ohio 44120.
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:

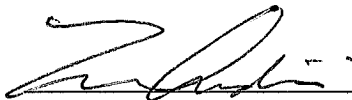
Supreme Court of Ohio 1994
U.S. Court of Appeals, Sixth Circuit 1998
U.S.D.C., Northern District of Ohio 1996
U.S.D.C., Southern District of Ohio 2008
6. I have never been denied pro hac vice admission in this state.
7. I have never had pro hac vice admission revoked in this state.
8. I have never been 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.

Dated: 8/6/15


Mark J. Andreini

STATE OF OHIO

SS:

COUNTY OF CUYAHOGA

Subscribed and sworn to before me this 6th day of August, 2015.


Notary Public



MICHELE A. FAULHABER
NOTARY PUBLIC
FOR THE
STATE OF OHIO
My Commission Expires
August 26, 2019