

THE STATE OF NEW HAMPSHIRE
SUPREME COURT

No. 2005-_____

VENISE THERESA GONYA, et al

v.

ROGER A. SEVIGNY

APPLICATION OF STEPHEN BLACKBURN TO APPEAR *PRO HAC VICE*
PURSUANT TO SUPREME COURT RULE 33

NOW COMES the undersigned attorney, Stephen Blackburn, and respectfully requests that this Court permit his appearance *pro hac vice* in the above-entitled action being commenced by Notice of Appeal filed simultaneously herewith. In support of this request, Attorney Blackburn swears and attests to the following, under oath:

1. I reside at 5303 Bradford Drive, Dallas, Texas 75235 and am an attorney with the law firm of Baron & Budd, P.C., 3102 Oaklawn Avenue, Suite 1100, Dallas, Texas 75219-4281.

2. Plaintiff Venise Theresa Gonya resides at 28 Kelwyn Drive, Somersworth, New Hampshire 03878 and her telephone number is 603-742-3208. Plaintiff Roxane S. Scaife resides at 16 Old Mont Vernon Road, Amherst, New Hampshire 03031 and her telephone number is (603) 787-6284.

3. I am an attorney duly admitted and licensed to practice law in the state of Texas, where I was admitted on May 4, 2004. I am also admitted and licensed to practice law in the state of California, where I was admitted on December 1, 2004. I am also admitted to the bar of the United States District Court for the Northern District of Texas, where I was admitted on July

7, 2004. I am a member in good standing and eligible to practice law in Texas and California and before the bars of the above listed courts.

4. I have not: (i) been denied admission *pro hac vice* in this State; (ii) had admission *pro hac vice* revoked in this State; or (iii) otherwise formally been disciplined or sanctioned by any court in this State.

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


6. I have not 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.

7. I applied to appear *pro hac vice* in the Merrimack County Superior Court in the matter of Venise Theresa Gonya, et al. v. Roger A. Sevigny, et al., Docket No. 04-E-0208. The Motion to Appear *Pro Hac Vice* with Assent was filed with the Court on July 27, 2004 and granted by the Court on the same date.

8. Attorneys Thomas R. Watson, NH Bar #2670 and Jennifer A. Lemire, NH Bar #11316, of the law firm Watson & Lemire, P.A., 75 Congress Street, Suite 211, P.O. Box 469, Portsmouth, New Hampshire 03802-0469, (603) 436-7667, are both active members in good standing of the Bar of this State and will be associated with me in the representation of the Plaintiffs in this matter and present at oral argument.

9. I believe the foregoing statements are true to the best of my knowledge and belief.

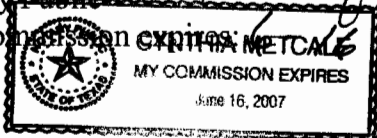
Dated: February 28, 2005



Stephen Blackburn

STATE OF TEXAS)
)
COUNTY OF DALLAS)

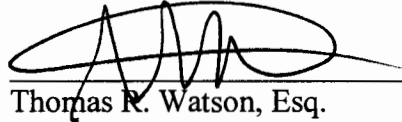
Sworn to and subscribed before me this 28th day of February, 2005.

Cynthia Metcalf
Notary Public
My commission **CYNTHIA METCALF** 2007
 MY COMMISSION EXPIRES
June 16, 2007

RULE 21 (5) CERTIFICATION

I hereby certify that, pursuant to Supreme Court Rule 21 (5), Suzanne M. Gorman, Esquire, counsel for the defendant herein, has been apprised of the relief sought in the within application and has indicated her consent thereto.

Date: March 1, 2005



Thomas R. Watson, Esq.