

THE STATE OF NEW HAMPSHIRE  
SUPREME COURT

In the Matter of the Liquidation of  
The Home Insurance Company

No. 2005-00740

*Assented To*  
**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 Gary S. Lee, Esquire and Pieter Van Tol, Esquire, attorneys in the Lovells Law Firm, as counsel to Century Indemnity Company, ACE Property and Casualty Insurance Company, Pacific Employers Insurance Company, and ACE American Reinsurance Company (collective, the “ACE Companies”). In support of this motion, I state as follows:

(1) As set forth in greater details in the affidavits of Gary S. Lee, Esquire, and Pieter Van Tol, Esquire, previously filed with the Merrimack County Superior Court and submitted herewith, each of these attorneys are licensed to practice before the Bars of the states of New York as well as other jurisdictions.

(2) Each of these attorneys is a member in good standing and eligible to practice in each jurisdiction and court to which he or she has been admitted.

(3) Neither attorney is currently suspended or disbarred in any jurisdiction and none is aware of any pending disciplinary matter against him.

(4) I will be actively associated with Gary S. Lee, Esquire, and Pieter Van Tol, Esquire, during the pendency of this matter, and I, or a member of my firm, will be present at all hearings in this matter.

(5) Liquidator’s counsel and Benjamin Moore’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,

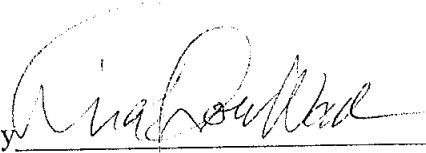
Century Indemnity Company,  
ACE Property and Casualty Insurance  
Company, Pacific Employers Insurance  
Company, and ACE American Reinsurance  
Company

By their attorneys,

ORR & RENO, P.A.  
One Eagle Square  
P.O. Box 3550  
Concord, NH 03302-3550  
Telephone (603) 224-2381  
Facsimile (603) 224-2318

Date: December 21, 2005

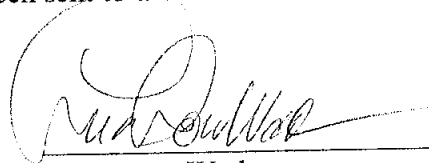
By



Lisa Snow Wade

CERTIFICATE OF SERVICE

I, Lisa Snow Wade, certify that on this 21st day of December, 2005, copies of the foregoing Motion to Admit *Pro Hac Vice* have been sent to the attached service list.



Lisa Snow Wade

THE STATE OF NEW HAMPSHIRE  
SUPREME COURT

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**AFFIDAVIT OF GARY S. LEE**

Gary S. Lee, Esquire, having been duly sworn, deposes and says:

1. My name is Gary S. Lee, and I am a partner in the firm of Lovells, 900 Third Avenue, 16<sup>th</sup> Floor, New York, New York 10022.
2. I am licensed to practice law in the State of New York (admitted 1991) and have been admitted to practice before the following courts:  
  
United States District Court for the Eastern District of New York;  
United States District Court for the Southern District of New York; and  
United Kingdom and Wales.
3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.
4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.
5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

Date: December 6, 2005

By: Gary S. Lee  
Gary S. Lee

STATE OF NEW YORK     )  
COUNTY OF NEW YORK ) ss.:

On this 6<sup>th</sup> day of December, 2005, Gary S. Lee personally appeared before the undersigned and made oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.



Notary Public

My commission expires: May 24, 2008

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**ERIKA ORELLANA**  
Notary Public - State of New York  
Reg. No. 01OR0110119  
Qualified in Westchester County  
Commission Expires May 24, 2008

THE STATE OF NEW HAMPSHIRE  
SUPREME COURT

In the Matter of the Liquidation of  
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No. 2005-00740

**AFFIDAVIT OF PIETER VAN TOL**

Pieter Van Tol, Esquire, having been duly sworn, deposes and says:

1. My name is Pieter Van Tol, and I am a partner in the firm of Lovells, 900 Third Avenue, 16<sup>th</sup> Floor, New York, New York 10022.

2. I am licensed to practice law in the State of New York (admitted 1995) and have been admitted to practice before the following courts:

United States District Court for the Eastern District of New York;  
United States District Court for the Southern District of New York; and  
the United States Court of Appeals for the Second Circuit.

3. I am a member in good standing and eligible to practice in each jurisdiction and court to which I have been admitted.

4. I am not currently suspended or disbarred in any jurisdiction nor am I aware of any pending disciplinary matter pertaining to me.

5. I am familiar with the Local Rules of the Superior Court for the State of New Hampshire.

Date: December 7, 2005

By: Pieter Van Tol  
Pieter Van Tol

STATE OF NEW YORK )  
COUNTY OF NEW YORK ) ss.:

On this 7<sup>th</sup> day of December, 2005, Pieter Van Tol personally appeared before the undersigned and made oath that the facts recited in the foregoing affidavit are true to the best of his knowledge and belief.



Notary Public

My commission expires: May 24, 2008

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**ERIKA ORELLANA**  
Notary Public - State of New York  
Reg. No. 01OR6110119  
Qualified in Westchester County  
Commission Expires May 24, 2008