

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In re: American Network Insurance Company : DOCKET NO. 1 ANI 2009
In Rehabilitation :
: :
In re: Penn Treaty Network America Insurance : DOCKET NO. 1 PEN 2009
In Rehabilitation :

**MOTION FOR ADMISSION *PRO HAC VICE* OF
STEPHEN H. WARREN, ESQUIRE, TO REPRESENT BROADBILL PARTNERS, L.P.**

Elizabeth J. Goldstein, Esquire of the law firm of Dilworth Paxson LLP, counsel of record for Broadbill Partners, L.P (“Broadbill”) hereby moves this Court for an order pursuant to Pa.R.A.P. 3781(c)(5), Pa.R.C.P. 1012.1 and Rule 301 of the Pennsylvania Bar Admission Rules, admitting, Stephen H. Warren, Esquire, to the bar of this Court, *pro hac vice*, for the purpose of representing Broadbill, and avers the following in support thereof:

1. Broadbill, by and through their attorney, Elizabeth J. Goldstein, seeks to admit Stephen H. Warren, Esquire to the bar of this Court for the purpose of actively participating in the above-captioned matter.

2. Mr. Warren is counsel with O'Melveny & Myers LLP located at 400 So. Hope Street; Los Angeles, CA 90071. Mr. Warren was admitted to the Bar of the State of California in 1988 and has also been admitted to practice before a number of other courts including:

U.S. District Court, Central District of California, 1989

He is in good standing to practice before all courts to which he has been admitted. *See* Affidavit of Stephen H. Warren, Esquire, attached hereto at Exhibit “A”.

3. Mr. Warren has applied to the Pennsylvania IOLTA Board and paid the appropriate fee. Attached at Exhibit "B" is the fee payment certification letters from the Pennsylvania IOLTA Board for the above-captioned cases.

4. The information required by Section 81.504 of the Pennsylvania IOLTA regulations in order for Mr. Warrant to be admitted *pro hac vice* has been provided to the Pennsylvania IOLTA Board

5. Mr. Warren has an attorney-client relationship with Broadbill, and has special skill, knowledge and experience relating to this case.

6. Mr. Warren is familiar with Pennsylvania Bar Admission Rule 301, and has agreed to abide by the Rules of Professional Conduct applicable to Pennsylvania lawyers.

7. Mr. Warren will be associated with Elizabeth J. Goldstein of Dilworth Paxson LLP at all remaining stages of this action.

8. Elizabeth J. Goldstein is a member in good standing of the Bar of the Commonwealth of Pennsylvania.

9. Elizabeth J. Goldstein will be counsel of record for Broadbill, and will continue to participate fully in this litigation and accept service of all papers on Broadbill's behalf.

10. Elizabeth J. Goldstein submits a verified statement pursuant to Pa.R.C.P. 1012.1(d)(2) which is attached as Exhibit "C" to this Motion.

11. There is no good cause for denial of this motion.

WHEREFORE, it is respectfully requested that this Court grant Mr. Warren leave to appear as counsel *pro hac vice* for Broadbill Partners, L.P..

Respectfully submitted,

DILWORTH PAXSON LLP



Elizabeth J. Goldstein, Esq.

PA I.D. No. 73779

Penn National Insurance Plaza

1101 N. 2nd Street, Suite 1101

Harrisburg, PA 17101

Telephone: (717) 213-4106

Facsimile: (717) 236-7811

Email: egoldstein@dilworthlaw.com

Dated: April 24, 2014

EXHIBIT "A"

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In re: American Network Insurance Company :
In Rehabilitation :
 :
 :
In re: Penn Treaty Network America Insurance :
In Rehabilitation :
 :
 :

**AFFIDAVIT OF STEPHEN H. WARREN, ESQUIRE IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*
ON BEHALF OF BROADBILL PARTNERS, L.P.**

STATE OF CALIFORNIA)
) SS.
COUNTY OF LOS ANGELES)

I, Stephen H. Warren, hereby submit this affidavit in support of the Motion for Admission *Pro Hac Vice* to represent Broadbill Partners, L.P. in this action in the Commonwealth Court of Pennsylvania. In support of this Motion made pursuant to Pa. R.C.P. 1012.1, I swear and affirm that the following is true and correct based upon my personal knowledge:

1. I am counsel with O'Melveny & Myers LLP located at 400 So. Hope Street; Los Angeles, CA 90071. Telephone: (213) 430-6000 and (213) 430-7875, Facsimile: (213) 430-6407.

2. I was admitted to the Bar of the State of California in 1988. My attorney identification number is 136895ASB2957-V74G. I also have been admitted to practice before the following other court:

U.S. District Court, Central District of California, 1989

3. I have never been suspended, disbarred, or otherwise disciplined, nor am I subject to any disciplinary proceedings.

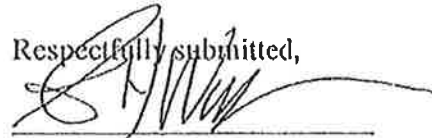
4. There are no other pending actions in Pennsylvania, other than the instant proceedings, in which I have applied for *pro hac vice* admission.

5. I agree to comply with and be bound by the applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

6. I agree to subject myself to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts or omissions occurring during my appearance in this matter for which admission *pro hac vice* is being sought.

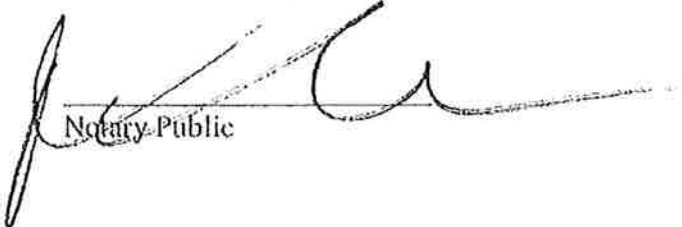
7. Further, I have consented to the appointment of Elizabeth J. Goldstein, Esquire, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in this matter for which admission *pro hac vice* is being sought.

Respectfully submitted,



Stephen H. Warren, Esquire
O'Melveny & Myers LLP
400 South Hope Street
Los Angeles, CA 90071
Telephone 213-430-6000
213-430-7875
Fax 213-430-6407

Sworn to and subscribed before me
this 23rd day of April 2014.



Notary Public



EXHIBIT “B”

SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

April 24, 2014

STEPHEN HOPKINS WARREN, Esq.
O'MELVENY & MYERS LLP
400 SO. HOPE STREET
LOS ANGELES, CA 90071

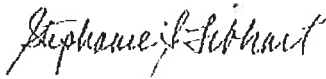
SENT TO STEPHEN H. WARREN VIA Email: SWARREN@OMM.COM

Dear Attorney WARREN:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$200.00 fee paid by Check on this date related to your pursuit for admission *pro hac vice* in the case identified as In Re: American Network Insurance Company in Rehabilitation, no. NO. 1 ANI 2009, filed in the Commonwealth Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,



Stephanie S. Libhart
Executive Director

cc: ELIZABETH JAN GOLDSTEIN, Esq.

egoldstein@dilworthlaw.com

Pennsylvania Judicial Center
601 Commonwealth Ave., Ste. 2400
PO Box 62445, Harrisburg, PA 17106-2445
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX
paiolta@pacourts.us · www.paiolta.org

Administering Pennsylvania's Interest On Lawyers Trust Account (IOLTA) Program

SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

April 24, 2014

STEPHEN HOPKINS WARREN, Esq.
O'MELVENY & MYERS LLP
400 SO. HOPE STREET
LOS ANGELES, CA 90071

SENT TO STEPHEN H. WARREN VIA Email: SWARREN@OMM.COM

Dear Attorney WARREN:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$200.00 fee paid by Check on this date related to your pursuit for admission *pro hac vice* in the case identified as In Re: Penn Treat Network America Insurance Company in Rehabilitation, no. NO. 1 PEN 2009, filed in the Commonwealth Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,



Stephanie S. Libhart
Executive Director

cc: ELIZABETH JAN GOLDSTEIN, Esq.
egoldstein@dilworthlaw.com

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EXHIBIT “C”

VERIFICATION

I, Elizabeth J. Goldstein, Esq., state:

(1) After reasonable investigation, I reasonably believe that Stephen H. Warren, to be a reputable and competent attorney and I am in a position to recommend the Mr. Warren's admission.

(2) I am not acting as the sponsor of any other candidate for admission *pro hac vice* in Pennsylvania.

(3) The proceeds from the settlement of a cause of action in which the Mr. Warren is granted admission *pro hac vice* shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

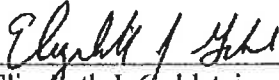
I hereby declare under penalty of perjury that the forgoing is true and correct to the best of my knowledge.


Elizabeth J. Goldstein

DATED: April 25, 2014

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of April 2014, I served a true and correct copy of the foregoing document on the following individual(s) via postage-prepaid, first class mail and addressed as to the individuals at the addresses indicated on the attached master service list.



Elizabeth J. Goldstein

