

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America : No. 1 PEN 2009
Insurance Company in Rehabilitation :

In Re: American Network Insurance : No. 1ANI 2009
Company in Rehabilitation :

ORDER GRANTING MOTION FOR ADMISSION
PRO HAC VICE OF JANE DALL WILSON

AND NOW, this ____ day of _____, 2016, upon consideration of the Motion for Admission *Pro Hac Vice* for Jane Dall Wilson, Esquire, it is hereby ORDERED that the Motion is GRANTED for the limited purpose of her representation of National Organization of Life & Health Insurance Guaranty Associations (“NOLHGA”), in the above-captioned matters.

Mary Hannah Leavitt, Judge

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America : No. 1 PEN 2009
Insurance Company in Rehabilitation :

In Re: American Network Insurance : No. 1 ANI 2009
Company in Rehabilitation :

MOTION FOR ADMISSION *PRO HAC VICE*

Mark D. Bradshaw, Esquire, hereby moves that Jane Dall Wilson, Esquire, be admitted to appear and practice in this Court as co-counsel for the National Organization of Life & Health Insurance Guaranty Associations (“NOLHGA”) in the above-captioned matter as counsel *pro hac vice* pursuant to Pa. R.C.P. No. 1012.1.

The undersigned counsel, Mark D. Bradshaw, Esquire, is a Shareholder with the law firm of Stevens & Lee, P.C., and is admitted to practice in this Court and therefore makes the instant Motion.

In support of this motion, undersigned counsel attaches the Verification for Admission *pro hac vice* of attorney Jane Dall Wilson, Esquire, filed herewith as Exhibit “A”, which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

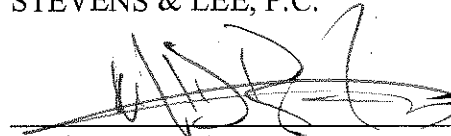
The submission of the appropriate form and payment of the required \$375 admission fee to the Pennsylvania IOLTA Board has been accomplished on behalf of Jane Dall Wilson. *See* acknowledgement attached as Exhibit “B”.

In support of this motion, undersigned counsel attaches a Verification for Admission *pro hac vice* of Mark D. Bradshaw, Esquire, filed herewith as Exhibit "C", which, it is averred, satisfies the requirements of the foregoing Rule of Civil Procedure.

Dated: 1/14, 2016

Respectfully Submitted,

STEVENS & LEE, P.C.



Mark D. Bradshaw, Esquire
Attorney I.D. No. 61975
17 North Second Street, 16th Floor
Harrisburg, PA 17101
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(610) 371-7362 (facsimile)
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*Attorney for National Organization of Life &
Health Insurance Guaranty Associations*

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America : No. 1 PEN 2009
Insurance Company in Rehabilitation :
: :
In Re: American Network Insurance : No. 1ANI 2009
Company in Rehabilitation :
: :
:

VERIFICATION

I, Jane Dall Wilson, Esquire, am a member in good standing of the Bar of the following courts:

Jurisdiction	Year Admitted	Bar No.
Supreme Court of the State of Indiana	2003	24142-71

I do not currently have, nor have I ever had, any disciplinary proceedings pending against me in any Federal or State Court, nor have I ever been reprimanded, suspended, or disbarred from the practice of law. I have no pending disciplinary complaint as to which a finding has been made that the complaint should proceed to a hearing.

I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice when facing a disciplinary complaint before this court or any other court.

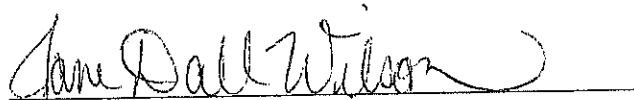
I have not applied for *pro hac* vice admission in any other case in Pennsylvania. I am requesting *pro hac* vice admission in the Commonwealth Court of Pennsylvania in the following consolidated matters: (1) *In re Penn Treaty Network America Insurance Company in Rehabilitation*, Case No. 1 PEN 2009 and (b) *In re American Network Insurance Company in Rehabilitation*, Case No. 1ANI 2009 (collectively, the "cases").

I shall comply with and be bound by the applicable statutes, case law, and procedure rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Procedural Conduct.

I shall submit to the jurisdiction of the Pennsylvania Courts and the Pennsylvania Disciplinary Board with respect to acts or omissions occurring during the appearance in this case.

I consent to the appointment of Mark D. Bradshaw, Esquire and Stevens & Lee, P.C. 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 the Cases.

Dated: January 8, 2016


Jane Dall Wilson, Esquire

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America : No. 1 PEN 2009
Insurance Company in Rehabilitation :

In Re: American Network Insurance : No. 1ANI 2009
Company in Rehabilitation :


VERIFICATION

I, Mark D. Bradshaw, Esquire certify and affirm that after reasonable investigation, I reasonably believe that Jane Dall Wilson, Esquire is a reputable and competent attorney, and I am in a position to recommend this candidate for *pro hac vice* admission for practice in the Commonwealth Court of Pennsylvania.

I have previously sponsored Deborah Ellingboe, David Herzog, Charles Richardson, and Caryn Glawe for *pro hac vice* admission before this Court in the above-captioned matter. Ms. Ellingboe has since withdrawn.

If applicable at the conclusion of this matter, I affirm that the proceeds from any settlement related to this cause of action in which attorneys Jane Dall Wilson, Esquire, David Herzog, Esquire, Charles Richardson, Esquire, and Caryn Glawe, Esquire, are 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 IOLTA provisions thereof.

Date: 11/14, 2016



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CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon the following persons:

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Philadelphia, PA 19103

Elizabeth J. Goldstein
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Date: 1/14/16

By: 

Mark D. Bradshaw, Esquire

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America
Insurance Company in Rehabilitation

: No. 1 PEN 2009
:

In Re: American Network Insurance
Company in Rehabilitation

: No. 1ANI 2009
:
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NOTICE OF FILING

National Organization of Life & Health Insurance Guaranty Associations (“NOLHGA”), by and through their undersigned counsel, give notice to all interested persons currently on the Master Service List that on Jan 14, 2016, a Motion for Admission *Pro Hac Vice* was filed.


A copy of this filing will be available for viewing, downloading, and/or printing on the Penn Treaty website at <http://www.penn treaty.com>. The website contains a link to all documents filed in the above matters, appearing in Adobe PDF format.

If any person on the Master Service List does not have access to a computer or is otherwise unable to view, download, or print the filing at the Penn Treaty website, a copy of the filing may be obtained by calling the undersigned counsel.

Dated: 1/14, 2016

Respectfully Submitted,

STEVENS & LEE, P.C.


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Attorney I.D. No. 61975
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*Attorney for National Organization of Life &
Health Insurance Guaranty Associations*



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

January 07, 2016

JANE DALL WILSON, Esq.
FAEGRE BAKER DANIELS
300 N. MERIDIAN STREET
SUITE 2700
INDIANAPOLIS, IN 46204

SENT TO DEBORAH L. MILLER VIA Email: DEBORAH.MILLER@FAEGREBD.COM

Dear Attorney WILSON:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as In Re: Penn Treaty Network America Insurance Company in Rehabilitation; In Re: American Network Insurance Company in Rehabilitation, no. 1 PEN 2009; 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: MARK DAVID BRADSHAW, Esq.
(717) 234-1099

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