

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

RECEIVED  
COMMONWEALTH COURT  
OF PENNSYLVANIA  
28 SEP 2015 10 06

MOTION FOR ADMISSION PRO HAC VICE

Mark D. Bradshaw, Esquire, hereby moves that Deborah Ellingboe, 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 Deborah Ellingboe, 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 \$~~250~~<sup>375</sup> admission fee to the Pennsylvania IOLTA Board has been accomplished. See acknowledgements 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: 9/24, 2015

Respectfully Submitted,

STEVENS & LEE, P.C.



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Mark D. Bradshaw, Esquire  
Attorney I.D. No. 61975  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
(717) 255-7357  
(610) 371-7362 (facsimile)  
mdb@stevenslee.com

*Attorney for Limited Intervenor National  
Organization of Life & Health Insurance Guaranty  
Associations*

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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

I, Deborah Ellingboe, Esquire, am a member in good standing of the Bar of the following courts:

Jurisdiction	Year Admitted	Bar No.
Minnesota	1995	26216X

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 complaints 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: (a) *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. 1 ANI 2009 (collectively, the "Cases").

I shall 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.

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 the Cases.

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: September 21, 2015

  
Deborah Ellingboe, Esquire

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

In Re: Penn Treaty Network America  
Insurance Company in Rehabilitation

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No. 1 PEN 2009

In Re: American Network Insurance  
Company in Rehabilitation

VERIFICATION

I, Mark D. Bradshaw, Esquire certify and affirm that after reasonable investigation, I reasonably believe that Deborah Ellingboe, 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 three of Ms. Ellingboe's colleagues (David Herzog, Charles Richardson, and Caryn Glawe) for *pro hac vice* admission before this Court in the above-captioned matter.

If applicable at the conclusion of this matter, I affirm that the proceeds from any settlement related to this cause of action in which attorney Deborah Ellingboe, Esquire 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 IOLTA provisions thereof.

Date: September 24, 2015



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Mark D. Bradshaw, Esquire  
Attorney I.D. No. 61975  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
(717) 255-7357  
(610) 371-7362 (facsimile)  
[mdb@stevenslee.com](mailto:mdb@stevenslee.com)

**CERTIFICATE OF SERVICE**

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

Carl M. Buchholz, Esq.  
DLA Piper LLP (US)  
One Liberty Place  
1650 Market Street, Suite 4900  
Philadelphia, PA 19103

Elizabeth J. Goldstein  
Dilworth Paxson, LLP  
112 Market Street, Suite 800  
Harrisburg, PA 17101

James R. Potts, Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103

Stephen H. Warren  
O'Melveny & Myers LLP  
400 South Hope Street  
Los Angeles, CA 90071

Patrick H. Cantilo  
Cantilo & Bennett LLP  
11401 Century Oaks Terrace, Suite 300  
Austin, TX 78758


Harold S. Horwich  
John P. Lavelle, Jr.  
Benjamin J. Cordiano  
Morgan Lewis LLP  
One State Street  
Hartford, CT 06103-3178

Douglas Y. Christian  
Benjamin M. Schmidt  
Ballard Spahr LLP  
1735 Market Street, 51st Floor  
Philadelphia, PA 19103-7300

Thomas A. Leonard  
Richard P. Limburg  
Obermayer Rebmann Maxwell & Hippel LLP  
One Penn Center, 19th Floor  
1617 John F. Kennedy Blvd.  
Philadelphia, PA 19103-1895

Paul M. Hummer  
James S. Gnoskos  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38th Floor  
Philadelphia, PA 19102-2186

Date: September 24, 2015

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

To: Prothonotary

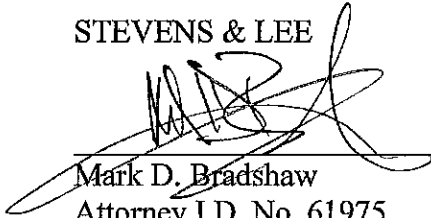
**PRAECIPE TO ADD EXHIBIT TO MOTION FOR ADMISSION PRO HAC VICE**

Kindly add the attached Exhibit B to the Motion for Admission Pro Hac Vice filed on or about September 24<sup>th</sup>, 2015.

Respectfully submitted,

Dated: September 28, 2015

STEVENS & LEE



Mark D. Bradshaw  
Attorney I.D. No. 61975  
17 North Second Street  
16th Floor  
Harrisburg, PA 17101  
(717) 234-1090  
(610) 371-7362 (Facsimile)  
mdb@stevenslee.com

*Attorneys for Limited Intervenor National Organization  
of Life & Health Insurance Guaranty Associations*

RECEIVED  
COMMONWEALTH COURT  
OF PENNSYLVANIA  
30 SEP 2015 08 34





SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

September 25, 2015

DEBORAH ANN ELLINGBOE, Esq.  
FAEGRE BAKER DANIELS LLP  
2200 WELLS FARGO CENTER  
90 SOUTH SEVENTH STREET  
MINNEAPOLIS, MN 55402

SENT TO DEBORAH A. ELLINGBOE VIA Email: DEBBIE.ELLINGBOE@FAEGREBD.COM

Dear Attorney ELLINGBOE:

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, 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.

[mdb@stevenslee.com](mailto:mdb@stevenslee.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](mailto:paiolta@pacourts.us) · [www.paiolta.org](http://www.paiolta.org)

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

**CERTIFICATE OF SERVICE**

I, Mark D. Bradshaw, Esquire, certify that on this date, I served a certified true and correct copy of the foregoing Praecipe to add Exhibit upon the following counsel of record, by depositing the same in the United States mail, postage prepaid, addressed as follows:

James R. Potts, Esq.  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103  
planservice@cozen.com

Patrick H. Cantilo  
Special Deputy Rehabilitator  
Cantilo & Bennett LLP  
11401 Century Oaks Terrace, Suite 300  
Austin, TX 78758  
phcantilo@cb-firm.com

Elizabeth Goldstein  
Dilworth Paxson, LLP  
112 Market Street, Suite 800  
Harrisburg, PA 17101

Carl Buccholz  
DLA Piper LLP  
1650 Market Street  
Philadelphia, PA 19103-7300  
carl.buccholz@dlpaper.com

Douglas Y. Christian  
Benjamin M. Schmidt  
Ballard Spahr LLP  
1735 Market Street, 51<sup>st</sup> Floor  
Philadelphia, PA 19103  
christiand@ballardspahr.com  
schmidt@ballardspahr.com

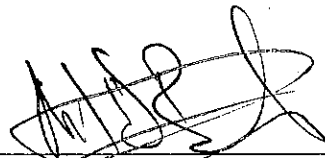
Paul M. Hummer  
Saul Ewing LLP  
Centre Square West  
1500 Market Street, 38<sup>th</sup> Floor  
Philadelphia, PA 19102-2186  
phummer@saul.com

Stephen H. Warren  
O.Melveny & Myers LLP  
400 South Hope Street  
Los Angeles, CA 90071

Harold Horwich  
John P. Lavelle, Jr.  
Benjamin J. Cordiano  
Morgan Lewis LLP  
One State Street  
Hartford, CT 06103-3178

Thomas A. Leonard  
Richard Limburg  
Obermayer Rebmann Maxwell & Hippell LLP  
One Penn Center, 19<sup>th</sup> Floor  
1617 John F. Kennedy Blvd.  
Philadelphia, PA 19103

Dated: September 28, 2015



Mark D. Bradshaw  
Attorney ID # 61975  
STEVENS & LEE,  
A Professional Corporation  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101