IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BLACKWATER SECURITY CONSULTING, : LLC, a Delaware Limited Liability Company; :

and BLACKWATER LODGE AND TRAINING CENTER, INC., a Delaware

Corporation,

Plaintiffs,

v.

WESTCHESTER SURPLUS LINES
INSURANCE COMPANY, a Georgia
Corporation; EVANSTON INSURANCE
COMPANY, an Illinois Corporation;
FIDELITY AND CASUALTY COMPANY
OF NEW YORK, a South Carolina
Corporation; and LIBERTY INSURANCE
UNDERWRITERS, a Massachusetts
Corporation,

Defendants.

CIVIL ACTION

Civil Action No. 2:05-cv-06020-PBT

DEFENDANT FIDELITY AND CASUALTY COMPANY'S MOTION FOR ADMISSION PRO HAC VICE OF REBECCA WOODS, ESQUIRE

Defendant Fidelity and Casualty Company of New York (hereinafter "Fidelity"), by its counsel, files this application, pursuant to Local Rule of Civil Procedure 83.5.2, for the admission *pro hac vice* of Rebecca Woods, Esquire, and, in support, thereof, avers as follows:

- Ms. Woods is a partner in the Washington, D.C. office of Seyfarth Shaw LLP,
 815 Connecticut Avenue, N.W., Washington, D.C. 2006-4004. Seyfarth Shaw LLP represents
 Fidelity in this matter.
- 2. Ms. Woods is a member in good standing of the bar in the District of Columbia and has been admitted to practice in the District of Columbia since 2000. She has also been

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admitted to practice in and is a member in good standing of the bar of the United States District Court for the District of Columbia.

- 3. Ms. Woods has not been denied admission or been disciplined by any court.
- 4. Ms. Woods has carefully reviewed the Local Rules of this Honorable Court.
- 5. Ms. Woods has experience handling other insurance coverage matters in multiple jurisdictions.
- 6. Fidelity respectfully requests that there is good cause for the admission of Ms. Woods pro hac vice.
- 7. Fidelity further respectfully requests that this motion be granted so that Ms. Woods may attend and participate in all matters on its behalf and otherwise engage in pre-trial, trial, and post-trial proceedings in connection with this action.
- 8. This motion is made by Ronald P. Schiller, Esquire, who is a member in good standing of the bar of the Commonwealth of Pennsylvania and State of New York; the United States District Courts for the Eastern District of Pennsylvania, the Middle District of Pennsylvania and the Southern District of New York; and the United States Court of Appeals for the Third Circuit.

WHEREFORE, Defendant Fidelity and Casualty Company of New York respectfully requests that the application for admission pro hac vice of Rebecca Woods, Esquire, be granted.

Respectfully submitted,

Ronald P. Schiller

Michael R. Carlson

Attorneys for defendant

Columbia Casualty Company

mat. For

Piper Rudnick LLP

3400 Two Logan Square

18th and Arch Streets

Philadelphia, PA 10103

(215) 656-3300

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BLACKWATER SECURITY CONSULTING, LLC, a Delaware Limited Liability Company; and BLACKWATER LODGE AND

TRAINING CENTER, INC., a Delaware

Corporation,

CIVIL ACTION

Civil Action No. 2:05-cv-06020-PBT

Plaintiffs,

v.

WESTCHESTER SURPLUS LINES INSURANCE COMPANY, a Georgia Corporation; EVANSTON INSURANCE COMPANY, an Illinois Corporation; FIDELITY AND CASUALTY COMPANY OF NEW YORK, a South Carolina Corporation; and LIBERTY INSURANCE UNDERWRITERS, a Massachusetts Corporation,

Defendants.

VERIFICATION

I hereby certify that the information contained in my Application for Admission Pro Hac

Vice is true and accurate to the best of my knowledge, information, and belief.

Rebecca Woods Seyfarth Shaw LLP

815 Connecticut Avenue, N.W., Washington, D.C. 2006-4004

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

BLACKWATER SECURITY CONSULTING, LLC, a Delaware Limited Liability Company; and BLACKWATER LODGE AND TRAINING CENTER, INC., a Delaware Corporation,

Civil Action No. 2:05-cv-06020-PBT

CIVIL ACTION

Plaintiffs,

WESTCHESTER SURPLUS LINES
INSUPANCE COMPANY a Coordia

INSURANCE COMPANY, a Georgia Corporation; EVANSTON INSURANCE COMPANY, an Illinois Corporation; FIDELITY AND CASUALTY COMPANY OF NEW YORK, a South Carolina Corporation; and LIBERTY INSURANCE UNDERWRITERS, a Massachusetts Corporation,

v.

Defendants.

LOCAL COUNSEL ENDORSEMENT

By my signature below, be it known that I hereby consent to the Application for Admission Pro Hac Vice of Rebecca Woods in the above-captioned matter and that I will participate in this action as local attorney in the manner required by Local Rule of Civil

Procedure 83.5.2, United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

Ronald P. Schiller/RPS4415

Michael R. Carlson

DLA Piper US LLP

One Liberty Place

1650 Market Street, Suite 4900

Philadelphia, PA 19103-2762

(215) 656-3330

Attorneys for Fidelity and Casualty Company of New York

mo C. Sec

Dated: March 9, 2007.

CERTIFICATE OF SERVICE

I, Michael R. Carlson, hereby certify that on March 9, 2007, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice was filed electronically and it is available for viewing and downloading from the ECF system; a true and correct copy of same was sent via U.S. first-class mail, postage pre-paid, upon the following:

Dennis J. Valenz, Esquire MORGAN LEWIS & BOCKIUS LLP 1701 Market Street Philadelphia, PA 19103

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