

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE:**

**Senior Health Insurance Company of  
Pennsylvania in Rehabilitation**

**No. 1 SHP 2020**

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**APPLICATION FOR ADMISSION OF  
JANE DALL WILSON, ESQUIRE, AS ADDITIONAL COUNSEL FOR  
NATIONAL ORGANIZATION OF LIFE AND HEALTH INSURANCE  
GUARANTY ASSOCIATIONS**

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D. Alicia Hickok  
PA ID No. 87604  
Faegre Drinker Biddle & Reath LLP  
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(215) 988-2700 (telephone)  
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*Counsel for Intervenor  
National Organization of Life and Health  
Insurance Guaranty Associations*

Intervenor National Organization of Life and Health Insurance Guaranty Associations (“NOLHGA”), through the below-signed counsel of record, who is undertaking to sponsor Jane Dall Wilson, Esquire, respectfully requests that the Court admit Ms. Wilson *pro hac vice* for purposes of this matter, and in support thereof, the sponsor avers as follows:

1. NOLHGA seeks to have Jane Dall Wilson, Esquire, admitted *pro hac vice* in this matter for the purposes of representing Intervenor as additional counsel.

2. Ms. Wilson is an attorney with Faegre Drinker Biddle & Reath LLP with offices at 300 N. Meridian Street, Suite 2500, Indianapolis, Indiana 46204. *See* Ex. A, Verified Statement of Jane Dall Wilson, Esquire, ¶ 1. The telephone number of this office is (317) 237-0300. *Id.*

3. Ms. Wilson is admitted to practice in the State of Indiana (Admitted 2003, license number 24142-71). Ex. A ¶ 2.

4. Ms. Wilson is a member in good standing of the bar of the Courts of Indiana. *See* Ex A ¶ 2.

5. Ms. Wilson is not subject to any disciplinary proceedings and is not currently suspended or disbarred in any Court. *See* Ex. A ¶¶ 3-4.

6. Ms. Wilson is familiar with Rule 301 of the Pennsylvania Bar Admission Rules and Rule 1012.1 of the Pennsylvania Rules of Civil Procedure

and will be associated with D. Alicia Hickok, Esquire, of Faegre Drinker Biddle & Reath LLP at all stages of these proceedings. *See* Ex. A ¶ 8.

7. Ms. Wilson has satisfied the requirements of the Interest on Lawyers Trust Account (“IOLTA”) Board set forth in 204 Pa. Code §§ 81.504 and 81.505 and has paid the requisite fee. *See* Ex. 1 to Ex. A, IOLTA Verification Letter, September 18, 2020.

8. Ms. Hickok is a member in good standing of the bar of the Commonwealth of Pennsylvania. *See* Ex. B, Verified Statement of D. Alicia Hickok, Esquire, ¶ 1.

9. Ms. Hickok is and will remain counsel of record for Intervenor NOLHGA. *See id.* ¶ 3.

10. Rule 301(a) of the Pennsylvania Bar Admission Rules provides, in pertinent part, that:

An attorney, barrister, or advocate who is qualified to practice in the courts of another state or of a foreign jurisdiction may be specially admitted to the bar of this Commonwealth for purposes limited to a particular matter. An attorney, barrister or advocate admitted *pro hac vice* in a matter shall not thereby be authorized to act as attorney of record in such matter.

11. A Pennsylvania Court shall grant a motion for admission *pro hac vice* “unless good cause for denial shall appear.” *Id.* at Rule 301(b)(2); *see also* Pa. R.C.P. No. 1012.1(e) (“The court shall grant the motion unless the court, in its

discretion, finds good cause for denial.”). No good cause exists to deny this request for *pro hac vice* admission.

12. The Rehabilitator does not oppose this application.

WHEREFORE, Ms. Hickok, as sponsor, respectfully requests, on behalf of NOLHGA, that this Court specially admit Ms. Wilson *pro hac vice* as additional counsel on behalf of NOLHGA in this matter.

Dated: September 22, 2020

Respectfully submitted,

/s/ D. Alicia Hickok

D. Alicia Hickok (PA ID No. 87604)

Faegre Drinker Biddle & Reath LLP

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*Counsel for Intervenor*

*National Organization of Life and*

*Health Insurance Guaranty Associations*

### **Proof of Service**

I hereby certify that a copy of the foregoing was served by electronic transmission (by consent) on the following this 22nd day of September, 2020:

Cozen O'Connor  
[shipcomments@cozen.com](mailto:shipcomments@cozen.com)

Patrick Cantilo  
[service@cb-firm.com](mailto:service@cb-firm.com)

A copy of the foregoing was also served by electronic transmission on each person listed on the master service list, as well as all parties granted Intervenor status as in this matter as of the date of filing. The following Intervenors were mailed hard copies of this filing at the addresses below:

James F. Lipinski  
PO Box 291395  
Port Orange, FL 321129

Georgianna Parisi  
257 Regency Ridge Dr.  
Dayton, OH 45459

Dated: September 22, 2020

/s/ D. Alicia Hickok

D. Alicia Hickok  
PA ID No. 87604  
Faegre Drinker Biddle & Reath LLP  
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*Counsel for National Organization of  
Life and Health Insurance Guaranty  
Associations*

## **EXHIBIT A**

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE:**

**Senior Health Insurance Company of  
Pennsylvania in Rehabilitation**

**No. 1 SHP 2020**

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**VERIFIED STATEMENT OF JANE DALL WILSON, ESQUIRE**

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I, Jane Dall Wilson, Esquire, make this statement in support of Intervenor National Organization of Life and Health Insurance Guaranty Associations Application for *Pro Hac Vice* Admission of Jane Dall Wilson, Esquire as Additional Counsel to appear in this matter before the Commonwealth Court of Pennsylvania.

1. I am an attorney at Faegre Drinker Biddle & Reath LLP, 300 N. Meridian Street, Suite 2500, Indianapolis, Indiana, 46204, telephone number (317) 237-0300.

2. I am an attorney in good standing of the bar of the State of Indiana (State Bar No. 24142-71 (admitted 2003)).

3. No disciplinary proceedings have been instituted against me or are pending against me in any jurisdiction.

4. I am not currently suspended or disbarred in any court.
5. I have been admitted *pro hac vice* in one pending action in all Courts of record in Pennsylvania, and I never been denied *pro hac vice* admission in Pennsylvania. I also have not been denied *pro hac vice* admission in any other state.
6. 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.
7. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance in this matter.
8. I am familiar with Rule 301 of the Pennsylvania Bar Admission Rules and Rule 1021.1 of the Pennsylvania Rules of Civil Procedure and attest that I will be associated with D. Alicia Hickok, Esquire, at all stages of, and for the purposes limited to, this proceeding.
9. I consent to the appointment of the sponsoring attorney, Ms. Hickok, as the agent on whom service of process shall be made for all actions, including any disciplinary action, that may arise out of the practice of law in this matter.
10. The fee required by Section 81.505(a) of the Pennsylvania Interest on Lawyers Trust Account Board (“IOLTA”) Regulations for *Pro Hac Vice*




Admission has been paid and the information required by Section 81.504 of the Pennsylvania IOLTA Board Regulations for *Pro Hac Vice* Admissions has been provided to the IOLTA Board. *See* Ex. 1, IOLTA Verification Letter, dated September 18, 2020.

11. I hereby affirm that the above facts are true to the best of my knowledge and belief.

12. This Statement is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsifications to authorities.

Dated: September 22, 2020

  
\_\_\_\_\_  
Jane Dall Wilson, Esquire

## **EXHIBIT 1**



SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

September 18, 2020

JANE DALL WILSON, Esq.  
FAEGRE DRINKER BIDDLE & REATH LLP  
300 N. MERIDIAN STREET  
SUITE 2500  
INDIANAPOLIS, IN 46204

SENT TO JANE DALL WILSON VIA Email: JANE.WILSON@FAEGREDRINKER.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 Senior Health Insurance Company of Pennsylvania in Rehabilitation, no. 1 SHP 2020, 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,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart  
Executive Director

cc: DOROTHY ALICIA HICKOK, Esq.  
alicia.hickok@faegredrinker.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

## **EXHIBIT B**

**IN THE COMMONWEALTH COURT OF PENNSYLVANIA**

**IN RE:**

**Senior Health Insurance Company of  
Pennsylvania in Rehabilitation**

**No. 1 SHP 2020**

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**VERIFIED STATEMENT OF D. ALICIA HICKOK, ESQUIRE**

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I, D. Alicia Hickok, make this statement in support of Intervenor National Organization of Life and Health Insurance Guaranty Association's Application ("NOLHGA") for *Pro Hac Vice* Admission of Jane Dall Wilson, Esquire, as Additional Counsel to appear in this matter before the Superior Court of Pennsylvania.

1. I am an attorney with Faegre Drinker Biddle & Reath LLP with offices at One Logan Square, Suite 2000, Philadelphia, PA 19103-6996, telephone number (215) 988-2700, and am a member in good standing of the bar of the Commonwealth of Pennsylvania, Attorney Identification No. 87604.

2. After reasonable investigation, I believe that Ms. Wilson is a reputable and competent attorney, and I am in a position to recommend her admission *pro hac vice*.

3. I am acting as Ms. Wilson's sponsor in this case. I am presently counsel of record for NOLHGA in this matter and will remain so throughout the course of this litigation.

4. There are currently seven actions in this Commonwealth, besides this one, in which I am sponsoring attorneys to appear *pro hac vice*. I am not currently sponsoring any attorneys to appear *pro hac vice* in any other case pending in the Commonwealth Court of Pennsylvania.

5. The proceeds from the settlement of a cause of action in which Ms. Wilson 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 Interest on Lawyers Trust Account provisions thereof.

6. I hereby affirm that the above facts are true to the best of my knowledge and belief.

7. This statement is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Dated: September 22, 2020

/s/ D. Alicia Hickok  
D. Alicia Hickok

Senior Health Insurance Company of Pennsylvania (In Rehabilitation)  
Master Service List  
As of June 2020

**Parties**

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(NOLGHA)**

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