

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

**MOTION FOR ADMISSION *PRO HAC*
VICE OF MICHAEL J. BROADBENT**

PETITIONER, Tracy L. Eggleston, Esq., on behalf of Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation, requests the entry of order allowing Michael J. Broadbent, Esq. to appear as counsel, *pro hac vice*, in the subject case, filed in the Court of the Common Pleas for Richland County in the State of South Carolina, and, as grounds, states as follows:

1. As reflected in the Affidavit of Michael J. Broadbent, Esq., filed herein as Exhibit “A” in support of this Motion, Michael J. Broadbent is a member in good standing with the Pennsylvania State Bar and the New Jersey State Bar.

2. Michael J. Broadbent with Cozen O’Connor consents to be subject to the jurisdiction and rules of the South Carolina Supreme Court governing professional conduct. Tracy

L. Eggleston with Cozen O'Connor is currently local counsel in this case and will remain as local counsel.

3. Petitioner, Tracy L. Eggleston has conferred with plaintiffs' counsel Geoffrey R. Bonham before filing this motion, and he has no objection to Mr. Broadbent's *pro hac vice* admission in this action.

4. Petitioner, Tracy L. Eggleston has been associated by and will be appearing with Mr. Broadbent in this proceeding. She is a member of the law firm of Cozen O'Connor, 301 S. College Street, One Wells Fargo Center, Suite 2100, Charlotte, North Carolina 28202. She is a member in good standing with the South Carolina Bar and will accept service of any and all matters connected with the proceedings, or any disciplinary matters with the same effect as if personally served on Mr. Broadbent within this State.

5. Unless permitted to withdraw sooner by order of the Court, Mr. Broadbent will continue to represent Defendants until the final determination of action; and with reference to all matters incident to this proceeding, Mr. Broadbent agrees that he shall be subject to the Orders and amendable to the disciplinary actions and civil jurisdiction of the South Carolina Supreme Court and Courts of this State as if he were regularly admitted and licensed member of the Bar of South Carolina in good standing.

WHEREFORE, Petitioner respectfully requests the entry of an Order allowing Michael J. Broadbent, Esq. to appear as counsel, *pro hac vice*, for Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation in this matter.

Respectfully submitted this the 9th day of December, 2021.

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

CERTIFICATE OF SERVICE

This is to certify that I electronically filed the foregoing Motion for Admission *Pro Hac Vice* of Michael J. Broadbent, and attachments thereto, with the Richland County Court of Common Pleas using the electronic filing system, which will send electronic notification of such filing to the following counsel of record listed below:

Geoffrey R. Bonham
Associate General Counsel
S.C. Department of Insurance
P.O. Box 100105
Columbia, SC 29202-3105
Email: gbonham@doi.sc.gov
Counsel for Plaintiffs

December 9, 2021
Charlotte, North Carolina

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

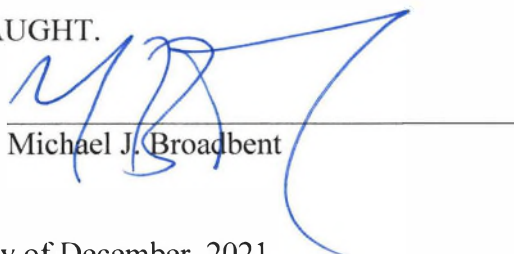
Defendants.

**AFFIDAVIT OF MICHAEL J.
BROADBENT IN SUPPORT OF
VERIFIED APPLICATION
FOR ADMISSION PRO HAC
VICE**

COMES NOW, Michael J. Broadbent, Affiant herein, and respectfully represents the
following:

1. That he is not a resident of South Carolina.
2. That he is not regularly employed in South Carolina.
3. That he is not regularly engaged in the practice of law or in substantial business or
professional activities in South Carolina.

FURTHER AFFIANT SAYETH NAUGHT.


Michael J. Broadbent

Philadelphia County, Pennsylvania

Signed and Sworn to before me this 8th day of December, 2021.


Notary Public, State of Pennsylvania (S E A L)
My Commission Expires: July 2, 2025

EXHIBIT A

Commonwealth of Pennsylvania - Notary Seal
EMILY M. KROHN, Notary Public
Philadelphia County
My Commission Expires July 2, 2025
Commission Number 1089762

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

**MOTION FOR ADMISSION *PRO HAC*
VICE OF DEXTER R. HAMILTON**

PETITIONER, Tracy L. Eggleston, Esq., on behalf of Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation, requests the entry of order allowing Dexter R. Hamilton, Esq. to appear as counsel, *pro hac vice*, in the subject case, filed in the Court of the Common Pleas for Richland County in the State of South Carolina, and, as grounds, states as follows:

1. As reflected in the Affidavit of Dexter R. Hamilton, Esq., filed herein as Exhibit “A” in support of this Motion, Dexter R. Hamilton is a member in good standing with the Pennsylvania State Bar and the New Jersey State Bar.

2. Dexter R. Hamilton with Cozen O’Connor consents to be subject to the jurisdiction and rules of the South Carolina Supreme Court governing professional conduct. Tracy L.

Eggleston with Cozen O'Connor is currently local counsel in this case and will remain as local counsel.

3. Petitioner, Tracy L. Eggleston has conferred with plaintiffs' counsel Geoffrey R. Bonham before filing this motion, and he has no objection to Mr. Hamilton's *pro hac vice* admission in this action.

4. Petitioner, Tracy L. Eggleston has been associated by and will be appearing with Mr. Hamilton in this proceeding. She is a member of the law firm of Cozen O'Connor, 301 S. College Street, One Wells Fargo Center, Suite 2100, Charlotte, North Carolina 28202. She is a member in good standing with the South Carolina Bar and will accept service of any and all matters connected with the proceedings, or any disciplinary matters with the same effect as if personally served on Mr. Hamilton within this State.

5. Unless permitted to withdraw sooner by order of the Court, Mr. Hamilton will continue to represent Defendants until the final determination of action; and with reference to all matters incident to this proceeding, Mr. Hamilton agrees that he shall be subject to the Orders and amendable to the disciplinary actions and civil jurisdiction of the South Carolina Supreme Court and Courts of this State as if he were regularly admitted and licensed member of the Bar of South Carolina in good standing.

WHEREFORE, Petitioner respectfully requests the entry of an Order allowing Dexter R. Hamilton, Esq. to appear as counsel, *pro hac vice*, for Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation in this matter.

Respectfully submitted this the 9th day of December, 2021.

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

CERTIFICATE OF SERVICE

This is to certify that I electronically filed the foregoing Motion for Admission *Pro Hac Vice* of Dexter R. Hamilton, and attachments thereto, with the Richland County Court of Common Pleas using the electronic filing system, which will send electronic notification of such filing to the following counsel of record listed below:

Geoffrey R. Bonham
Associate General Counsel
S.C. Department of Insurance
P.O. Box 100105
Columbia, SC 29202-3105
Email: gbonham@doi.sc.gov
Counsel for Plaintiffs

December 9, 2021
Charlotte, North Carolina

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

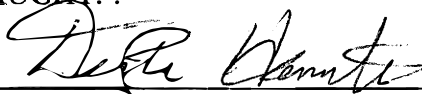
Defendants.

**AFFIDAVIT OF DEXTER R.
HAMILTON IN SUPPORT OF
VERIFIED APPLICATION FOR
ADMISSION PRO HAC VICE**

COMES NOW, Dexter R. Hamilton, Affiant herein, and respectfully represents the
following:

1. That he is not a resident of South Carolina.
2. That he is not regularly employed in South Carolina.
3. That he is not regularly engaged in the practice of law or in substantial business or
professional activities in South Carolina.

FURTHER AFFIANT SAYETH NAUGHT. .



Dexter R. Hamilton

Philadelphia County, Pennsylvania

Signed and Sworn to before me this 8th day of December, 2021.

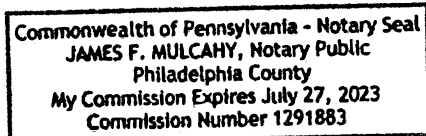


(S E A L)

Notary Public, State of Pennsylvania
My Commission Expires:

July 27, 2023

EXHIBIT A





The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE: (803) 734-1080
FAX: (803) 734-0394

December 2, 2021

Richland County
Clerk of Court
1701 Main Street, Room 205
Columbia, SC 29201

Re: Raymond G. Farmer, as Director of the South Carolina Department of Insurance, and the South Carolina Department of Insurance v. Jessica K. Altman, As Rehabilitator of Senior Health Insurance Company of Pennsylvania, et al

2020-CP-40-05802

Dear Clerk of Court:

I certify that the Office of Bar Admissions has received a verified application requesting Michael J. Broadbent be admitted *pro hac vice* in the above action. The \$250 filing fee for the applicant for the above action has been paid.

Yours truly,

Margaret C. McGee

Deputy Clerk for Bar Admissions

MCM/st

Cc: Michael J. Broadbent

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

Case No.

**VERIFIED APPLICATION FOR
ADMISSION *PRO HAC VICE* IN THE
STATE OF SOUTH CAROLINA**

COMES NOW, Michael J. Broadbent, applicant herein, and respectfully represents the following:

1. Applicant resides at 1420 Lee Circle, Yardley, Pennsylvania 19067. His residential Telephone Number is: 215-321-0131.

2. Applicant is an attorney and member of the law firm of Cozen O'Connor, with offices at 1650 Market Street, Suite 2800, Philadelphia, PA 19103. The Primary Telephone Number is: (215) 665-2166; Cell Phone Number is: 267-987-4755; Fax Number is: (215) 701-2166; and Email Address is: mbroadbent@cozen.com.

3. Applicant has been retained as a member of the above-named law firm by Defendants, JESSICA K. ALTMAN, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, PATRICK H. CANTILO, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and SENIOR HEALTH INSURANCE COMPANY OF

PENNSYLVANIA IN REHABILITATION, to provide legal representation in connection with this case now pending before this Court in the State of South Carolina.

4. Since October 27, 2010, Applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Pennsylvania, where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the State of Pennsylvania and New Jersey.

5. Applicant has been admitted to practice before the following courts:

<u>Court:</u>	<u>Date Admitted:</u>
Pennsylvania	10/27/2010
New Jersey	11/24/2010

USDC Eastern District of PA	01/13/2010
USDC New Jersey	03/01/2011
Second Circuit	12/18/2020
Third Circuit	8/27/2020
Fourth Circuit	5/12/2020
Eleventh Circuit	5/11/2020

Applicant is presently a member in good standing of the bars of those courts listed above.

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked.

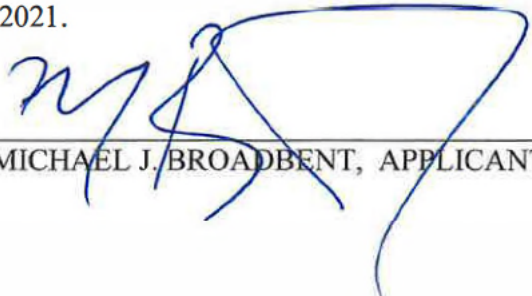
9. Local counsel of record associated with applicant in this case is Tracy L. Eggleston, Esq., Cozen O'Connor, 301 South College Street, One Wells Fargo Center, Suite 2100, Charlotte, Mecklenburg County, North Carolina 28202. The Primary Telephone Number is: (704) 348-3409; Cell Phone Number is: (704) 906-1405; Fax Number is: (877) 260-9441; and Email Address is: teggleston@cozen.com.

10. Applicant has not previously filed an application to appear *pro hac vice*, in South Carolina.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize himself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 22nd day of November, 2021.



MICHAEL J. BROADBENT, APPLICANT

STATE OF Pennsylvania)
COUNTY OF Philadelphia)
Verification

I, Michael J. Broadbent, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission *pro hac vice*. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear *pro hac vice* in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

APPLICANT/AFFIANT: Michael J. Broadbent

Subscribed and sworn to before me this 22 day of November, 2021.
James F Mulcahy
Notary Public State of Pennsylvania
My Commission Expires: July 27, 2023

(SEAL)

Commonwealth of Pennsylvania - Notary Seal
JAMES F. MULCAHY, Notary Public
Philadelphia County
My Commission Expires July 27, 2023
Commission Number 1291883

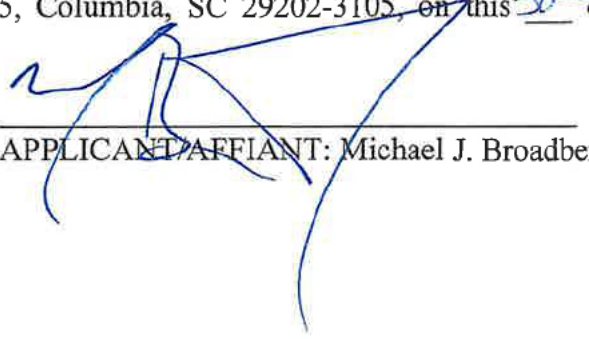
Local Counsel Consent

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

Dated this 30th day of November, 2021.
Tracy L. Eggleston
Local Counsel of Record: Tracy L. Eggleston

Certificate of Service

I hereby certify that I served a copy of this application upon the South Carolina Supreme Court by mail, addressed to: South Carolina Supreme Court, Office of Bar Admissions, P. O. Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the "South Carolina Supreme Court," and to Geoffrey B. Bonham, Esq., Associate General Counsel, S.C. Department of Insurance, P.O. Box 100105, Columbia, SC 29202-3105, on this 30th day of November, 2021.



APPLICANT/AFFIANT: Michael J. Broadbent



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Michael John Broadbent, Esq.

DATE OF ADMISSION

October 27, 2010

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 19, 2021

Amy Dreibelbis

Amy Dreibelbis, Esq.
Deputy Prothonotary

Supreme Court of New Jersey



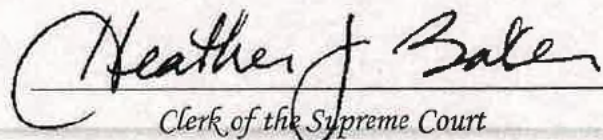
Certificate of Good Standing

This is to certify that **Michael J Broadbent**
(No. **043992010**) *was constituted and appointed an Attorney at Law of New Jersey on* **November 24, 2010** *and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.*

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

*In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
19th day of November, 2021 .*


Clerk of the Supreme Court



STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

**MOTION FOR ADMISSION *PRO HAC*
VICE OF MICHAEL J. BROADBENT**

PETITIONER, Tracy L. Eggleston, Esq., on behalf of Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation, requests the entry of order allowing Michael J. Broadbent, Esq. to appear as counsel, *pro hac vice*, in the subject case, filed in the Court of the Common Pleas for Richland County in the State of South Carolina, and, as grounds, states as follows:

1. As reflected in the Affidavit of Michael J. Broadbent, Esq., filed herein as Exhibit “A” in support of this Motion, Michael J. Broadbent is a member in good standing with the Pennsylvania State Bar and the New Jersey State Bar.

2. Michael J. Broadbent with Cozen O’Connor consents to be subject to the jurisdiction and rules of the South Carolina Supreme Court governing professional conduct. Tracy

L. Eggleston with Cozen O'Connor is currently local counsel in this case and will remain as local counsel.

3. Petitioner, Tracy L. Eggleston has conferred with plaintiffs' counsel Geoffrey R. Bonham before filing this motion, and he has no objection to Mr. Broadbent's *pro hac vice* admission in this action.

4. Petitioner, Tracy L. Eggleston has been associated by and will be appearing with Mr. Broadbent in this proceeding. She is a member of the law firm of Cozen O'Connor, 301 S. College Street, One Wells Fargo Center, Suite 2100, Charlotte, North Carolina 28202. She is a member in good standing with the South Carolina Bar and will accept service of any and all matters connected with the proceedings, or any disciplinary matters with the same effect as if personally served on Mr. Broadbent within this State.

5. Unless permitted to withdraw sooner by order of the Court, Mr. Broadbent will continue to represent Defendants until the final determination of action; and with reference to all matters incident to this proceeding, Mr. Broadbent agrees that he shall be subject to the Orders and amendable to the disciplinary actions and civil jurisdiction of the South Carolina Supreme Court and Courts of this State as if he were regularly admitted and licensed member of the Bar of South Carolina in good standing.

WHEREFORE, Petitioner respectfully requests the entry of an Order allowing Michael J. Broadbent, Esq. to appear as counsel, *pro hac vice*, for Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation in this matter.

Respectfully submitted this the 9th day of December, 2021.

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

CERTIFICATE OF SERVICE

This is to certify that I electronically filed the foregoing Motion for Admission *Pro Hac Vice* of Michael J. Broadbent, and attachments thereto, with the Richland County Court of Common Pleas using the electronic filing system, which will send electronic notification of such filing to the following counsel of record listed below:

Geoffrey R. Bonham
Associate General Counsel
S.C. Department of Insurance
P.O. Box 100105
Columbia, SC 29202-3105
Email: gbonham@doi.sc.gov
Counsel for Plaintiffs

December 9, 2021
Charlotte, North Carolina

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

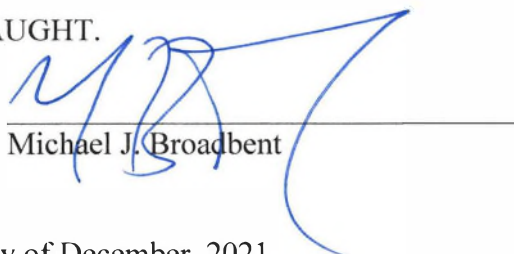
Defendants.

**AFFIDAVIT OF MICHAEL J.
BROADBENT IN SUPPORT OF
VERIFIED APPLICATION
FOR ADMISSION PRO HAC
VICE**

COMES NOW, Michael J. Broadbent, Affiant herein, and respectfully represents the
following:

1. That he is not a resident of South Carolina.
2. That he is not regularly employed in South Carolina.
3. That he is not regularly engaged in the practice of law or in substantial business or
professional activities in South Carolina.

FURTHER AFFIANT SAYETH NAUGHT.


Michael J. Broadbent

Philadelphia County, Pennsylvania

Signed and Sworn to before me this 8th day of December, 2021.


Notary Public, State of Pennsylvania (S E A L)
My Commission Expires: July 2, 2025

EXHIBIT A

Commonwealth of Pennsylvania - Notary Seal
EMILY M. KROHN, Notary Public
Philadelphia County
My Commission Expires July 2, 2025
Commission Number 1089762



The Supreme Court of South Carolina

DANIEL E. SHEAROUSE
CLERK OF COURT

BRENDA F. SHEALY
CHIEF DEPUTY CLERK

POST OFFICE BOX 11330
COLUMBIA, SOUTH CAROLINA 29211
TELEPHONE: (803) 734-1080
FAX: (803) 734-0394

December 3, 2021

Richland County
Clerk of Court
1701 Main Street, Room 205
Columbia, SC 29201

Re: Raymond G. Farmer, as Director of the South Carolina
Department of Insurance, and the South Carolina Department of Insurance v.
Jessica K. Altman, as rehabilitator of Senior Health Insurance Company of
Pennsylvania, et al

2020-CP-40-005802

Dear Clerk of Court:

I certify that the Office of Bar Admissions has received a verified
application requesting Dexter R. Hamilton be admitted *pro hac vice* in the
above action. The \$250 filing fee for the applicant for the above action has
been paid.

Yours truly,

Margaret C. McCabe/st

Deputy Clerk for Bar Admissions

MCM/st

Cc: Dexter R. Hamilton

11STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

vs.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

Case No.

**VERIFIED APPLICATION FOR
ADMISSION *PRO HAC VICE* IN THE
STATE OF SOUTH CAROLINA**



COMES NOW, Dexter R. Hamilton, applicant herein, and respectfully represents the
following:

1. Applicant resides at 6800 North 11th Street, Philadelphia, PA 19126. His residential Telephone Number is: (215) 837-4020.
2. Applicant is an attorney and member of the law firm of Cozen O'Connor, with offices at 1650 Market Street, Suite 2800, Philadelphia, PA 19103. The Primary Telephone Number is: (215) 665-2166; Cell Phone Number is: (215) 837-4020; Fax Number is: (215) 701-2166; and Email Address is: dhamilton@cozen.com.
3. Applicant has been retained as a member of the above-named law firm by Defendants, JESSICA K. ALTMAN, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, PATRICK H. CANTILO, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and SENIOR HEALTH INSURANCE COMPANY OF

PENNSYLVANIA IN REHABILITATION, to provide legal representation in connection with this case now pending before this Court in the State of South Carolina.

4. Since November 20, 1987, Applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Pennsylvania, where applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the State of Pennsylvania and New Jersey.

5. Applicant has been admitted to practice before the following courts:

<u>Court:</u>	<u>Date Admitted:</u>
Pennsylvania	11/20/1987
New Jersey	12/21/1990

U.S. Court of Appeals for the Fourth Circuit	2005
U.S. Court of Appeals for the Third Circuit	1995
USDC Eastern District of PA	1989
USDC Middle District of PA	1993
USDC of NJ	1991

Applicant is presently a member in good standing of the bars of those courts listed above.

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked.

9. Local counsel of record associated with applicant in this case is Tracy L. Eggleston, Esq., Cozen O'Connor, 301 South College Street, One Wells Fargo Center, Suite 2100, Charlotte, Mecklenburg County, North Carolina 28202. The Primary Telephone Number is: (704) 348-3409; Cell Phone Number is: (704) 906-1405; Fax Number is: (877) 260-9441; and Email Address is: teggleston@cozen.com.

10. Applicant has not previously filed an application to appear *pro hac vice*, in South Carolina.

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize himself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 29th day of November, 2021.


DEXTER R. HAMILTON, APPLICANT

Verification

STATE OF PENNSYLVANIA)

)

COUNTY OF PHILADELPHIA)

)

I, Dexter R. Hamilton, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission *pro hac vice*. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear *pro hac vice* in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.


 APPLICANT/AFFIANT: Dexter R. Hamilton

Subscribed and sworn to before me this 30th day of November, 2021.
James Mulcahy
 Notary Public State of Pennsylvania

My Commission Expires: July 27, 2023


 (SEAL)

Commonwealth of Pennsylvania - Notary Seal
 JAMES F. MULCAHY, Notary Public
 Philadelphia County
 My Commission Expires July 27, 2023
 Commission Number 1291883

Local Counsel Consent

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

Dated this ____ day of _____, 2021.

 Local Counsel of Record: Tracy L. Eggleston

Verification

STATE OF _____)

)

COUNTY OF _____)

)

I, Dexter R. Hamilton, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission *pro hac vice*. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear *pro hac vice* in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

 APPLICANT/AFFIANT: Dexter R. Hamilton

Subscribed and sworn to before me this ____ day of _____, 2021.

 Notary Public State of _____

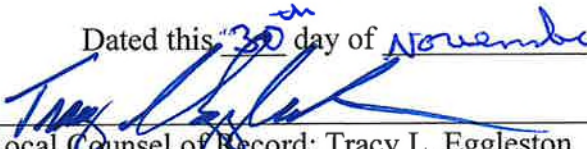
(SEAL)

My Commission Expires: _____

Local Counsel Consent

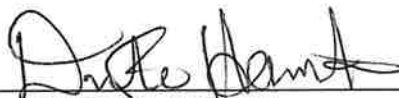
I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

Dated this ^{30th} day of November, 2021.


 Local Counsel of Record: Tracy L. Eggleston

Certificate of Service

I hereby certify that I served a copy of this application upon the South Carolina Supreme Court by mail, addressed to: South Carolina Supreme Court, Office of Bar Admissions, P. O. Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the "South Carolina Supreme Court," and to Geoffrey B. Bonham, Esq., Associate General Counsel, S.C. Department of Insurance, P.O. Box 100105, Columbia, SC 29202-3105, on this 1st day of Dec., 2021.



APPLICANT/AFFIANT: Dexter R. Hamilton

Supreme Court of New Jersey



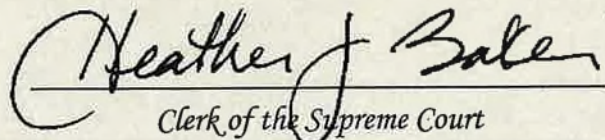
Certificate of Good Standing

This is to certify that **Dexter Ryan Hamilton**
(No. **041151990**) was constituted and appointed an Attorney at Law of New
Jersey on **December 21, 1990** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if
the Court's records reflect that the attorney: 1) is current with all assessments imposed as a
part of the filing of the annual Attorney Registration Statement, including, but not
limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not
suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this
State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-
12.

Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice
law in this State.

In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
12th day of October, 2021.


Clerk of the Supreme Court





Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Dexter Ryan Hamilton, Esq.

DATE OF ADMISSION

November 20, 1987

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



**Witness my hand and official seal
Dated: October 6, 2021**

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

Defendants.

**MOTION FOR ADMISSION *PRO HAC*
VICE OF DEXTER R. HAMILTON**

PETITIONER, Tracy L. Eggleston, Esq., on behalf of Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation, requests the entry of order allowing Dexter R. Hamilton, Esq. to appear as counsel, *pro hac vice*, in the subject case, filed in the Court of the Common Pleas for Richland County in the State of South Carolina, and, as grounds, states as follows:

1. As reflected in the Affidavit of Dexter R. Hamilton, Esq., filed herein as Exhibit “A” in support of this Motion, Dexter R. Hamilton is a member in good standing with the Pennsylvania State Bar and the New Jersey State Bar.

2. Dexter R. Hamilton with Cozen O’Connor consents to be subject to the jurisdiction and rules of the South Carolina Supreme Court governing professional conduct. Tracy L.

Eggleston with Cozen O'Connor is currently local counsel in this case and will remain as local counsel.

3. Petitioner, Tracy L. Eggleston has conferred with plaintiffs' counsel Geoffrey R. Bonham before filing this motion, and he has no objection to Mr. Hamilton's *pro hac vice* admission in this action.

4. Petitioner, Tracy L. Eggleston has been associated by and will be appearing with Mr. Hamilton in this proceeding. She is a member of the law firm of Cozen O'Connor, 301 S. College Street, One Wells Fargo Center, Suite 2100, Charlotte, North Carolina 28202. She is a member in good standing with the South Carolina Bar and will accept service of any and all matters connected with the proceedings, or any disciplinary matters with the same effect as if personally served on Mr. Hamilton within this State.

5. Unless permitted to withdraw sooner by order of the Court, Mr. Hamilton will continue to represent Defendants until the final determination of action; and with reference to all matters incident to this proceeding, Mr. Hamilton agrees that he shall be subject to the Orders and amendable to the disciplinary actions and civil jurisdiction of the South Carolina Supreme Court and Courts of this State as if he were regularly admitted and licensed member of the Bar of South Carolina in good standing.

WHEREFORE, Petitioner respectfully requests the entry of an Order allowing Dexter R. Hamilton, Esq. to appear as counsel, *pro hac vice*, for Defendants Jessica K. Altman, as Rehabilitator of Senior Health Insurance Company of Pennsylvania, Patrick H. Cantilo, as Special Deputy Rehabilitator of Senior Health Insurance Company of Pennsylvania, and Senior Health Insurance Company of Pennsylvania in Rehabilitation in this matter.

Respectfully submitted this the 9th day of December, 2021.

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

CERTIFICATE OF SERVICE

This is to certify that I electronically filed the foregoing Motion for Admission *Pro Hac Vice* of Dexter R. Hamilton, and attachments thereto, with the Richland County Court of Common Pleas using the electronic filing system, which will send electronic notification of such filing to the following counsel of record listed below:

Geoffrey R. Bonham
Associate General Counsel
S.C. Department of Insurance
P.O. Box 100105
Columbia, SC 29202-3105
Email: gbonham@doi.sc.gov
Counsel for Plaintiffs

December 9, 2021
Charlotte, North Carolina

s/Tracy L. Eggleston
COZEN O'CONNOR
Tracy L. Eggleston
SC State Bar No. 1856
One Wells Fargo Center
301 South College St., Suite 2100
Charlotte, NC 28202
teggleston@cozen.com
(704) 376-3400

*Counsel for Defendants Jessica K. Altman,
Insurance Commissioner of the
Commonwealth of Pennsylvania, as
Statutory Rehabilitator for Senior Health
Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior
Health Insurance Company of
Pennsylvania*

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

IN THE COURT OF COMMON PLEAS
FOR THE FIFTH JUDICIAL CIRCUIT
2020-CP-4005802

Raymond G. Farmer, as Director of the South
Carolina Department of Insurance, and the
South Carolina Department of Insurance,

Plaintiffs,

v.

Jessica K. Altman, as Rehabilitator of Senior
Health Insurance Company of Pennsylvania,
Patrick H. Cantilo, as Special Deputy
Rehabilitator of Senior Health Insurance
Company of Pennsylvania, and Senior Health
Insurance Company of Pennsylvania in
Rehabilitation,

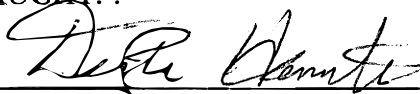
Defendants.

**AFFIDAVIT OF DEXTER R.
HAMILTON IN SUPPORT OF
VERIFIED APPLICATION FOR
ADMISSION PRO HAC VICE**

COMES NOW, Dexter R. Hamilton, Affiant herein, and respectfully represents the
following:

1. That he is not a resident of South Carolina.
2. That he is not regularly employed in South Carolina.
3. That he is not regularly engaged in the practice of law or in substantial business or
professional activities in South Carolina.

FURTHER AFFIANT SAYETH NAUGHT. .



Dexter R. Hamilton

Philadelphia County, Pennsylvania

Signed and Sworn to before me this 8th day of December, 2021.



(S E A L)

Notary Public, State of Pennsylvania
My Commission Expires:

July 27, 2023

EXHIBIT A

