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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

VIRGINIA: IN THE CIRCUIT COURT FOR THE COUNTY OF FAIRFAX

PAUL SHAO,

Plaintiff,

v.

Civil Action No.: 2021-03802

ALLSTATE INSURANCE COMPANY,

Defendant.

MOTION TO ADMIT *PRO HAC VICE*
JAMES SCOTT HUMPHREY AS CO-COUNSEL FOR DEFENDANT

Pursuant to Rule 1A:4 of the Rules of the Supreme Court of Virginia, undersigned counsel, who is a member in good standing of the Bar of this Court and the Commonwealth of Virginia, requests that this Court admit *pro hac vice* James Scott Humphrey, attorney in good standing with The State Bar of Illinois, to serve as an associate counsel for the Defendant Allstate Insurance Company in the above titled action. In support of this Motion, undersigned counsel respectfully represent the following:

1. James Scott Humphrey is an attorney with the law firm of Seyfarth Shaw LLP (“Seyfarth”) located in Chicago, Illinois.
2. Mr. Humphrey works out of the Seyfarth office with the following address and contact information: 233 S. Wacker Drive, Suite 8000, Chicago, Illinois 60606; telephone: (312) 460-5528; email address: shumphrey@seyfarth.com.
3. Mr. Humphrey is an attorney in good standing in the State of Illinois, admitted to practice before the state and federal courts in Illinois as detailed further within the respective sworn Application for Admission *Pro Hac Vice* attached hereto as Exhibit A. The required

application fee has been submitted along with this Motion for the Application as required by Rule 1A:4 of the Rules of the Supreme Court of Virginia.

4. Mr. Humphrey has not been disciplined by any Bar of any state nor has she been sanctioned by any court.

5. Mr. Humphrey has not sought admission *pro hac vice* in the courts of the Commonwealth of Virginia in the last twelve months.

6. The undersigned moves that James Scott Humphrey be permitted to appear in this Court as *pro hac vice* counsel on behalf of Defendant Allstate Insurance Company for all purposes permitted under the Rules of the Supreme Court of Virginia.

7. Undersigned local counsel, Renee B. Appel and James R. Billings-Kang, are members in good standing of the Bar of the Commonwealth of Virginia and at least one shall sign all pleadings and personally appear in all proceedings conducted before this Court.

WHEREFORE, the undersigned moves this Court for an Order admitting James Scott Humphrey, *pro hac vice*, for the limited purpose of appearing and participating in this action as *pro hac vice* counsel for Defendant Allstate Insurance Company.

DATED: June 7, 2021

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ Renée B. Appel

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*seeking admission *pro hac vice*

CERTIFICATE OF SERVICE

I certify that on June 7, a copy of the foregoing Motion to Admit *Pro Hac Vice* James Scott Humphrey as Co-Counsel for Defendant was emailed and mailed, postage pre-paid, to Plaintiff at the following address:

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/s/ Renée B. Appel
Renée B. Appel