

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

PAUL WASGATT,
Plaintiff,

v.

ALLSTATE INSURANCE COMPANY,
GLENN T. SHAPIRO, SCOTT BLUME and
EDWARD NORCIA,
Defendants.

CIVIL ACTION NO. 4:20-cv-40118

**DEFENDANTS' ASSENTED-TO
MOTION TO ADMIT ROBERT G.
LIAN JR. AND KATHERINE I.
HEISE *PRO HAC VICE***

Pursuant to Local Rule 83.5.3, Defendants, Allstate Insurance Company, Glenn T. Shapiro, Scott Blume, and Edward Norcia, through the undersigned members of the Bar of this Court, and with the assent of Plaintiff, Paul Wasgatt, move for the admission *pro hac vice* of Robert G. Lian Jr. and Katherine I. Heise as counsel for Defendants. In support of this Motion, the undersigned state as follows:

1. Certificates from Mr. Lian and Ms. Heise, made in compliance with Local Rule 83.5.3(e)(3), are filed with this Motion. The certificates affirm that Mr. Lian and Ms. Heise are members of the bar in good standing in every jurisdiction where they have been admitted to practice, there are no disciplinary proceedings pending against them as members of the bar in any jurisdiction, and they have not previously had a *pro hac vice* admission (or other admission for a limited purpose) to this Court revoked for misconduct. Furthermore, Mr. Lian and Ms. Heise have both read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

2. With this Court's approval, Mr. Lian and Ms. Heise will serve as co-counsel with Richard C. Van Nostrand and Brian M. Casaceli of Mirick, O'Connell, DeMallie, and Lougee,

LLP, both of whom are duly admitted to practice before this Court, and who have entered an appearance representing Defendants in the above-captioned case.

3. Plaintiff, Paul Wasgatt, through his counsel, has assented to this Motion.

WHEREFORE, Defendants, by the undersigned members of the Bar of this Court, respectfully request that this Court admit Robert G. Lian Jr. and Katherine I. Heise *pro hac vice* as co-counsel for Defendants in the above-captioned matter.

**ALLSTATE INSURANCE COMPANY,
GLENN T. SHAPIRO, SCOTT BLUME &
EDWARD NORCIA**

By their attorneys,

/s/ Brian M. Casaceli
Richard C. Van Nostrand, BBO #507900
Brian M. Casaceli, BBO #690580
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bcasaceli@mirickoconnell.com

Dated: September 22, 2020

CERTIFICATE OF SERVICE

I, Brian M. Casaceli, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/ Brian M. Casaceli

Brian M. Casaceli

Dated: September 22, 2020

UNITED STATES DISTRICT COURT
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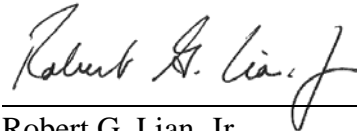
CIVIL ACTION NO. 4:20-cv-40118

**CERTIFICATE OF ROBERT G.
LIAN JR. FOR ADMISSION *PRO
HAC VICE***

I, Robert G. Lian Jr., hereby certify as follows:

1. I am an attorney in the law firm Akin Gump Strauss Hauer & Feld, LLP, 2001 K Street N.W., Washington, DC 20006.
2. My firm has been retained to represent Defendants, Allstate Insurance Company, Glenn T. Shapiro, Scott Blume, and Edward Norcia in this matter.
3. I am a member of the bar in the District of Columbia and the Commonwealth of Virginia.
4. I am a member of the bar in good standing in every jurisdiction in which I have been admitted to practice law.
5. There are no disciplinary actions pending against me as a member of the bar in any jurisdiction.
6. I have not previously had *pro hac vice* admission (or other limited admission for a limited purpose) to this Court revoked for misconduct.
7. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

8. With this Court's approval, I will be co-counsel for the Defendants, along with Richard C. Van Nostrand and Brian M. Casaceli who are admitted to practice before this Court, and Katherine I. Heise, who is also seeking admission *pro hac vice*.



Robert G. Lian, Jr.
Akin Gump Strauss Hauer & Feld
LLP
(*pro hac vice motion to be filed*)
2001 K Street N.W.
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blian@akingump.com
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Fax: (202) 887-4288

Dated: September 21, 2020

CERTIFICATE OF SERVICE

I, Brian M. Casaceli, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/ Brian M. Casaceli

Brian M. Casaceli

Dated: September 22, 2020

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Defendants.

CIVIL ACTION NO. 4:20-cv-40118

**CERTIFICATE OF KATHERINE I.
HEISE FOR ADMISSION *PRO HAC*
*VICE***

I, Katherine I. Heise, hereby certify as follows:

1. I am an attorney in the law firm Akin Gump Strauss Hauer & Feld, LLP, 2001 K Street N.W., Washington, DC 20006.
2. My firm has been retained to represent Defendants, Allstate Insurance Company, Glenn T. Shapiro, Scott Blume, and Edward Norcia in this matter.
3. I am a member of the bar in good standing in the District of Columbia.
4. There are no disciplinary actions pending against me as a member of the bar in any jurisdiction.
5. I have not previously had *pro hac vice* admission (or other limited admission for a limited purpose) to this Court revoked for misconduct.
6. I have read and agree to comply with the Local Rules of the United States District Court for the District of Massachusetts.

7. With this Court's approval, I will be co-counsel for the Defendants, along with Richard C. Van Nostrand and Brian M. Casaceli who are admitted to practice before this Court, and Robert G. Lian Jr., who is also seeking admission *pro hac vice*.

/s/ Katherine I. Heise
Katherine I. Heise
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Fax: (202) 887-4288

Dated: September 22, 2020

CERTIFICATE OF SERVICE

I, Brian M. Casaceli, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this day.

/s/ Brian M. Casaceli
Brian M. Casaceli

Dated: September 22, 2020