

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

**JUSTICE FAMILY GROUP, LLC, and
BLUESTONE RESOURCES, INC.,**

Plaintiffs,

v.

**CIVIL ACTION NO: CC-13-2022-C-25
Judge Jennifer P. Dent**

**STARR SURPLUS LINES INSURANCE
COMPANY, et al.,**

Defendants.

MOTION FOR ADMISSION *PRO HAC VICE* FOR A. NEILL THUPARI, ESQ.

NOW COMES Defendant, Aviva Insurance Limited, by and through its counsel, Michael J. Farrell and Austin T. Lewis of Farrell, White & Legg PLLC, and hereby respectfully moves this Honorable Court for an Order permitting A. Neill Thupari, Esquire of DLA Piper LLP (US), who is an attorney admitted to practice before the highest Court of Appeals for the State of Maryland, to appear in association with Michael J. Farrell and Austin T. Lewis of Farrell, White & Legg PLLC, and represent the interests of this Defendants in the above-styled civil litigation.

WHEREFORE, Defendant prays that the Court grant it the relief herein requested.

Dated: September 13, 2023.

Respectfully submitted

/s/ Michael J. Farrell

Michael J. Farrell, Esquire (WVSB: 1168)
Austin T. Lewis, Esquire (WVBS: 132221)
FARRELL, WHITE & LEGG PLLC
P.O. Box 6457
Huntington, WV 25772
Telephone: (304) 522-9100
Fax: (304) 522-9162
mjf@farrell3.com / atl@farrell3.com

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on this 13th day of September, 2023, a true and correct copy of the foregoing *Motion for Admission Pro Hac Vice for A. Neill Thupari, Esquire, Verified Statement of A. Neill Thupari, Esquire, and Written Statement of Michael J. Farrell* was filed via the West Virginia E-Filing system, which will provide notification to the following persons:

Ronald H. Hatfield, Jr. Esquire
General Counsel – Litigation
101 Main Street, West
White Sulphur Springs, WV 24986
Ron.hatfield@bluestone-coal.com
Counsel for Plaintiffs

Aaron Ryan, Esquire
Pillsbury Winthrop Shaw Pittman LLP
333 Commerce Street, Ste 1300
Nashville, TN 37201
Aaron.ryan@pillsburylaw.com
Counsel for Plaintiffs

Peter M. Gillon, Esquire
Brendan W. Hogan, Esquire
Pillsbury Winthrop Shaw Pittman UP
1200 Seventeenth St. NW
Washington, DC 20036
peter.gillon@pillsburylaw.com

brendan.hogan@pillsburylaw.com

Counsel for Plaintiffs

Lee Murray Hall, Esquire
JENKINSFENSTERMAKER, PLLC
325 Eight Street
Huntington, WV 25701-2225

lmh@JenkinsFenstermaker.com

Counsel for Starr Surplus Lines Insurance Company, The Princeton Excess and Surplus Lines Insurance Company, Houston Casualty Company, Aspen Specialty Insurance Company, Ironshore Specialty Insurance Company, and Certain Underwriters At Lloyd's London Subscribed to Policy UP1901643

William R. Slicer, Esquire
SHUMAN McCUSKEY SLICER PLLC
1411 Virginia Street East, Suite 200
P.O. Box 3953
Charleston, WV 25339-3953

wslicer@shumanlaw.com

Counsel for Starr Surplus Lines Insurance Company, The Princeton Excess and Surplus Lines Insurance Company, Houston Casualty Company, Aspen Specialty Insurance Company, Ironshore Specialty Insurance Company, and Certain Underwriters At Lloyd's London Subscribed to Policy UP1901643

Deanna M. Manzo, Esquire
Costantino P. Suriano, Esquire
Mound Cotton Wollan & Greengrass LLP
One New York Plaza
New York, NY 10004

Admitted Pro Hac Vice Counsel for Starr Surplus Lines Insurance Company, The Princeton Excess and Surplus Lines Insurance Company, Houston Casualty Company, Aspen Specialty Insurance Company, Ironshore Specialty Insurance Company, and Certain Underwriters At Lloyd's London Subscribed to Policy UP1901643

Michael Paul Markins, Esquire
LEWIS BRISBOIS BISGAARD & SMITH LLP
707 Virginia Street, E., Suite 1400
Charleston, WV 25301

Michael.Markins@lewisbrisbois.com

Counsel for Defendants Hallmark Speciality Insurance Co., and Maxum Indemnity Co.

John J. Kavanagh, Esquire
STEPTOE & JOHNSON LLP
1330 Connecticut Avenue, NW
Washington, DC 20036

E-mail: jkavanagh@steptoe.com

Admitted Pro Hac Vice Counsel for Maxum Indemnity Company

R. Booth Goodwin, II, Esquire
Benjamin B. Ware, Esquire
GOODWIN & GOODWIN, LLP
300 Summers Street, Ste. 1500
Charleston, WV 25301
rbg@goodwingoodwin.com bbw@goodwingoodwin.com
Counsel for Mitsui Sumitomo Insurance Company of America

Brian E. O'Donnell, Esquire
Maura C. Smith, Esquire
Riker Danzig LLP
One Speedwell Avenue
Morristown, NG 07960
Admitted Pro Hac Vice Counsel for Mitsui Sumitomo Insurance Company of America

/s/ Michael J. Farrell

Michael J. Farrell, Esquire (WVSB: 1168)
Austin T. Lewis, Esquire (WVSB: 13221)
FARRELL, WHITE & LEGG PLLC
P.O. Box 6457
Huntington, WV 25772
Telephone: (304) 522-9100
Fax: (304) 522-9162
ewl@farrell3.com
Counsel for Aviva Insurance Limited

A. Neill Thupari, Esquire
Michael P. O'Day, Esquire
DLA PIPER LLP (US)
The Marbury Building
6225 Smith Avenue, Suite 300
Baltimore, Maryland 21209-3600
Telephone: 410-580-3000
Fax: 410-580-4000
Neill.thupari@dlapiper.com
Michael.oday@dlapiper.com
Pro Hac Vice pending

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**ORDER GRANTING THE MOTION FOR ADMISSION PRO HAC VICE
FOR A. NEILL THUPARI, ESQUIRE**

Having duly considered the previously filed *Motion for Admission Pro Hac Vice for A. Neill Thupari, Esquire and Verified Statement of Application for Admission Pro Hac Vice of A. Neil Thupari, Esquire* and in compliance with Rule 8.0 of the Rules for Admission to the Practice of Law in the State of West Virginia, it is ORDERED that the *Motion for Admission Pro Hac Vice for A. Neill Thupari, Esquire* is GRANTED and that A. Neill Thupari be allowed to appear as counsel *pro hac vice* for Defendant Aviva Insurance Limited up to and until final adjudication and/or resolution of the matter raised in this action.

The Clerk is directed to mail a copy of this Order to counsel of record.

Dated this ____ day of _____, 2023.

Honorable Judge Jennifer P. Dent
Circuit Court of Greenbrier County, WV

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Defendants.

WRITTEN STATEMENT

The undersigned, Michael J. Farrell, as an active member in good standing of the West Virginia State Bar, hereby certifies that he agrees to participate in this matter as responsible local attorney in the above-styled matter with the applicant for admission pro hac vice, A. Neill Thupari, Esq., of DLA Piper LLP (US).

Respectfully submitted: September 13, 2023

Michael J. Farrell (WV Bar #1168)
mjf@farrell3.com
FARRELL, WHITE & LEGG PLLC
P.O. Box 6457
Huntington, WV 25772
Telephone: (304) 522-9100
Fax: (304) 522-9162
Counsel for Aviva Insurance Limited

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Defendants.

**VERIFIED STATEMENT OF APPLICATION FOR ADMISSION
PRO HAC VICE OF A. NEILL THUPARI**

Pursuant to Rule 8.0 of the *West Virginia Rules for Admission to the Practice of Law*,
Applicant A. Neill Thupari, Esquire, being duly sworn, hereby deposes and says as follows:

1. Action which is the subject of the Application:

Justice Family Group, LLC, et al. v. Starr Surplus Lines Insurance Company, et al.
Civil Action No. CC-13-2022-C-25

2. I am a member in good standing of the bar in the State of Maryland and the name,
address and telephone number of the disciplinary agency for this Court is:

Office of Bar Counsel
200 Harry S. Truman Parkway
Suite 300
Annapolis, MD 21401
Tel: (410 514-7051

3. In addition, I am a member in good standing of the following courts:

United States Court of Appeals for the Fourth Circuit;
United States District Court for the District of Maryland; and
United States District Court for the Eastern District of Michigan.

4. In the above-styled matter, I will be associated with Michael J. Farrell of Farrell,
White & Legg PLLC, a member of the bar of this Court, who maintains an office for the transaction

of business at 914 Fifth Avenue, Huntington, West Virginia 25772, which is located in Cabell County, West Virginia; and upon whom all pleadings, notices and papers may be served in accordance with Rule 8.0, West Virginia Rules for Admission to the Practice of Law. Filed contemporaneously herewith is the Written Statement of Michael J. Farrell, Esquire, evidencing his endorsement that he shall be the local attorney.

5. I am not currently, and within the past twenty-four months have not been, disbarred, suspended or otherwise disciplined by any Bar or court to which I have been admitted to practice law.

6. I have not been involved in matters pending before a West Virginia tribunal or other similar body within the twenty-four months preceding this *Verified Statement of Application*.

7. My law firm, DLA Piper LLP (US), has been involved in matters pending before West Virginia courts, tribunals, or other similar bodies in the twenty-four months preceding this *Verified Statement of Application*, as listed on Attachment A.

8. I have and will continue to familiarize myself with, and agree to comply with, all laws, rules and regulations of West Virginia State and local governments, where applicable, including taxing authorities and any standards for *pro bono* civil and criminal indigent defense legal services.

9. An application fee of Three Hundred Fifty Dollars (\$350.00) has been paid to the West Virginia State Bar (transaction receipt attached). A copy of this *Verified Statement of Application* will be delivered to the West Virginia State Bar concurrently with its submission to the Court.

WHEREFORE, Applicant A. Neill Thupari, Esquire, respectfully requests that this Honorable Court grant him the privilege of admission to practice law, *pro hac vice*, as counsel for

Defendant, Aviva Insurance Limited, in the matter of *Justice Family Group, LLC, et al. v. Starr Surplus Lines Insurance Company, et al.*, Civil Action No. CC-13-2022-C-25

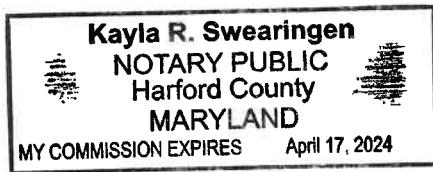
Respectfully submitted this 13th day of September, 2023.

A. Will Taylor

STATE OF Maryland

COUNTY OF Harford

Signed and sworn to before me, a Notary Public, this 13th day of September, 2023.



Kayla R. Swearingen
Notary Public

My Commission expires: April 17, 2024

ATTACHMENT A

NO.	CASES
1	In re: Raleigh General Hospital, CON File No. 21-1-12253-H
2	In re: Appalachian Regional Healthcare, Inc., CON File No. 22-1-12444-H
3	In re: Raleigh General Hospital, LLC, CON File No. 22-4-12592-P (<i>voluntarily withdrawn</i>)
4	In re: Charleston Area Medical Center, CON File No. 23-3-12666-A
5	In re: Charleston Area Medical Center, CON File No. 23-3-12667-P
6	Charleston Area Medical Center, Inc. v. Raleigh General Hospital and the West Virginia Health Care Authority, No. 22-ICA-169
7	Raleigh General Hospital, LLC, v. Appalachian Regional Healthcare, Inc., d/b/a Beckley ARH Hospital and West Virginia Health Care Authority, No. 23-ICA-138