



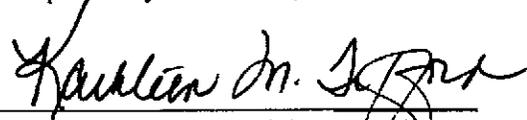
**MOTION TO ADMIT FREDERICK R. KESSLER AND WILLIAM A. MAHER  
PRO HAC VICE BY KATHLEEN M. TRAFFORD**

NOW COMES Kathleen W. Trafford, an attorney admitted to practice in Ohio and registered with the Attorney Registration Section for active status, pursuant to S. Ct. Prac. R. II, Section 2(B), and respectfully moves that attorneys Frederick R. Kessler and William A. Maher of the law firm of Wollmuth Maher & Deutsch LLP be admitted to practice in the Supreme Court of Ohio for the purpose of appearing as counsel for ACE Capital Title Reinsurance Company (“ACE Capital”) in the above-captioned case. In support of this motion, Ms. Trafford states:

1. Mr. Kessler and Mr. Maher are both duly licensed to practice law in the States of New York and New Jersey, in good standing with all the courts in which they are admitted and have not now, nor ever been, suspended or disbarred from the practice of law in any court.
2. Mr. Kessler and Mr. Maher have represented ACE Capital in the trial and appellate court proceedings and were admitted *pro hac vice* during those proceedings.
3. If admitted to practice before this Court, Mr. Kessler and Mr. Maher will comply with the rules and standards of professional conduct of this Court and of the State of Ohio.

WHEREFORE, it is respectfully requested that Frederick R. Kessler and William A. Maher be admitted to practice before the Court *pro hac vice* in the above-captioned case.

Respectfully submitted,



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(COUNSEL OF RECORD)

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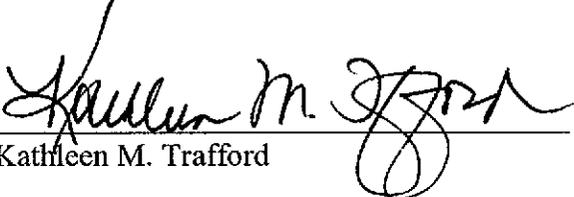
Facsimile: (212) 382-0050

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing *Motion of Appellant ACE Capital Title Reinsurance Company for Admission of Counsel Pro Hac Vice* was served by regular U.S. Mail, postage prepaid, this 28th day of January, 2008, upon the following counsel of record:

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Carpenter & Lipps LLP  
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Columbus, Ohio 43215

Counsel for Plaintiffs

  
Kathleen M. Trafford