

STATE OF NEW HAMPSHIRE
Superior Court
Rockingham, ss.
Case No. 215-2022-CV-00167

Steven Rand et al.

Petitioners,

v.

The State of New Hampshire

Defendant.

Granted



Honorable David W. Ruoff

October 1, 2024

Clerk's Notice of Decision
Document Sent to Parties
on 10/16/2024

MOTION FOR ADMISSION PRO HAC VICE

NOW COME Petitioners Steven Rand and Randvest, Inc., Dr. Robert Gabrielli and the Gabrielli Family Limited Partnership, Jessica Wheeler Russell and Adam Russell, James Lewis, and John Lunn, by and through their undersigned counsel, and hereby move to admit Attorney Zhenyan Zhong of the law firm White & Case LLP to practice before this Court in the above-referenced action. In support of this motion, Petitioners state as follows:

1. The undersigned are members of the Bar of this Court in good standing and are actively associated with Attorney Zhong of the law firm White & Case LLP in this action.
3. Attorney Zhong's verified application executed in accordance with Superior Court Rule 19 is attached hereto as **Exhibit A**.

WHEREFORE, Petitioners respectfully request that this Court enter an order permitting Attorney Zhong to appear for them, along with local counsel, in this matter.

Dated: September 27, 2024

Respectfully submitted,

/s/ John E. Tobin

John E. Tobin, Jr., NH Bar No. 2556
60 Stone Street
Concord, NH 03301
(603) 568-0735
jtobinjr@comcast.net

Andru Volinsky, NH Bar No. 2634
160 Law, PLLC
P.O. Box 1181, Concord, NH 03302
(603) 491-0376
andruvolinsky@gmail.com

Natalie Laflamme, NH Bar No. 266204
Laflamme Law, PLLC
100 N Main Street, Suite 512
Concord, NH 03301
(603) 937-5434
natalie@laflammelaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion has been served via the court's electronic filing system to all parties of record on this 27th day of September, 2024.

/s/ John E. Tobin

John E. Tobin, Jr., NH Bar No. 2556

STATE OF NEW HAMPSHIRE
Superior Court
Rockingham, ss.
Case No. 215-2022-CV-00167

Steven Rand et al.

Petitioners,

v.

The State of New Hampshire

Defendant.

VERIFIED APPLICATION FOR ADMISSION PRO HAC VICE

Zhenyan Zhong hereby applies to practice before this Court in the instant action pursuant to Superior Court Rule 19 and in support thereof states:

1. I reside at 3746 72nd St, Jackson Heights, New York 11372. My business address is 1221 Avenue of the Americas, New York, New York 10020.

2. I seek to represent Petitioners Mr. Steven Rand and Randvest, Inc., Dr. Robert Gabrielli and the Gabrielli Family Limited Partnership, Ms. Jessica Wheeler Russell and Mr. Adam Russell, Mr. James Lewis, and Mr. John Lunn. Petitioners reside at:

Mr. Steven Rand	120 Highland Street Plymouth, NH 03264
-----------------	---

Dr. Robert Gabrielli	40 Via Tranquilla Concord, NH 03301
----------------------	--

Ms. Jessica Wheeler Russell and Mr. Adam Russell	76 Manor Road Concord, NH 03303
---	------------------------------------

Mr. James Lewis

70 Turnberry Lane
Hopkinton, NH 03229

Mr. John Lunn

23 Fletcher Road
Newport, NH 03754

3. I am a member in good standing of the bars of the following courts:

<u>Courts</u>	<u>Period of Admission</u>
State of New York	2024

4. I have never been denied admission *pro hac vice* in New Hampshire (the “State”) and have never had my *pro hac vice* admission revoked in this State or otherwise been formally disciplined or sanctioned by any court in this State.

5. No formal, written disciplinary proceeding has ever been brought against me by any disciplinary authority within the last five years.

6. I have never been held in contempt or otherwise sanctioned by any court in written order in the last five years for disobedience to its rules or orders.

7. In the preceding two years, I have not filed an application to appear *pro hac vice* in this State.

8. The following counsel serve as local counsel in this matter and will be associated with me and one or more of who will be present at any proceedings:


Natalie Laflamme, NH Bar No. 266204
Laflamme Law, PLLC
100 N Main Street, Suite 512
Concord, NH 03301
(603) 937-5434
natalie@laflammelaw.com

John E. Tobin, Jr., NH Bar No. 2556
60 Stone Street
Concord, NH 03301
(603) 568-0735
jtobinjr@comcast.net

Andru Volinsky, NH Bar No. 2634
160 Law, PLLC
P.O. Box 1181
Concord, NH 03302
(603) 491-0376
andruvolinsky@gmail.com

WHEREFORE, Kim King respectfully requests that this Honorable Court permit her to practice before this Court in the above-captioned matter.

Respectfully submitted,



Zhenyan Zhong
White & Case LLP
1221 Avenue of the Americas
New York, NY 10020
(212) 819-8437
lance.zhong@whitecase.com

**STATE OF NEW YORK
COUNTY OF NEW YORK**

Zhenyan Zhong personally appeared before me on this 26th day of September, 2024 and made an oath that the foregoing statements are true.



**Notary Public
My Commission Expires:**

**ANA L. VERAS
Notary Public, State of New York
No. 01VE6231848
Qualified in Queens County
Commission Expires November 29, 2026**