
IN THE SUPREME COURT OF PENNSYLVANIA
No. 52 WM 2020

JOSEPH TAMBELLINI, INC.,
D/B/A JOSEPH TAMBELLINI RESTAURANT
PETITIONER

v.

ERIE INSURANCE EXCHANGE
RESPONDENT

MOTION FOR ADMISSION PRO HAC VICE OF
ADAM J. KAISER

RICHARD W. DiBELLA (#24711)
TARA L. MACZUZAK (#86709)
DiBELLA, GEER, McALLISTER
& BEST, P.C.
20 Stanwix St., 11th Fl.
Pittsburgh, PA 15222
(412) 261-2900

Counsel for Erie Insurance Exchange

Date: May 6, 2020

IN THE SUPREME COURT OF PENNSYLVANIA

JOSEPH TAMBELLINI, INC. d/b/a
JOSEPH TAMBELLINI
RESTAURANT,

No. 52 WM 2020

Petitioner

v.

ERIE INSURANCE EXCHANGE,

Respondent.

MOTION FOR ADMISSION *PRO HAC VICE* OF ADAM J. KAISER

COMES NOW, Tara L. Maczuzak, and DiBella, Geer, McAllister, Best, PC, as counsel for Respondent, Erie Insurance Exchange., and moves for the Admission *Pro Hac Vice* of Adam Kaiser of Alston & Bird, as co-counsel for Erie Insurance Exchange, in the above matter and in support of that Motion avers as follows:

1. Adam Kaiser is an attorney at the law firm of Alston & Bird, and maintains an office at 90 Park Avenue, 15th Floor, New York, NY. He is to be co-counsel for Respondent, Erie Insurance Exchange.

1. Adam Kaiser has been a member in good standing of the New York State Bar since 1993. He is also a member in good standing of the following courts:

- a. Supreme Court of New York, Admitted September, 1993. New York State Bar Number 2571834.
- b. Supreme Court New Jersey, Admitted December, 1992. New Jersey State Bar Number 041071992.

2. Adam Kaiser has not been the subject of disciplinary action in any court.

3. Adam Kaiser agrees to be subject to the jurisdiction of this Court for the purposes of representing Erie Insurance Exchange in this action.

4. Tara L. Maczuzak and DiBella, Geer, McAllister & Best, PC will continue to act as counsel of record for Erie Insurance Exchange.

5. Attached hereto as Exhibit "A" is the Undersigned's Verified Statement pursuant to the Pennsylvania Rule of Civil Procedure 1012.1(d)(2).

6. Attached hereto as Exhibit "B" is the Verified Statement of Adam Kaiser as required by Pennsylvania Rule of Civil Procedure 1012.1(c)(1).

7. Attached hereto as Exhibit "C" is the Acknowledgment letter of the Pennsylvania Interest on Lawyers Trust Account Board certifying the payment of the necessary fees by Adam Kaiser.

WHEREFORE, Respondent, Erie Insurance Exchange and Tara L Maczuzak move for an Order admitting Adam Kaiser, *Pro Hac Vice*, as co-counsel in the above-captioned matter.

Respectfully submitted,

DiBella, Geer, McAllister, Best, PC,

BY: */s/ Tara L. Maczuzak*

Tara L. Maczuzak

Pa. I.D. No. 86709

DiBella, Geer, McAllister & Best, PC

20 Stanwix Street, 11th Floor

Pittsburgh, PA 15222

412.261.2900-Telephone

412.261.3222-Facsimile

Attorney for Respondent,

Erie Insurance Exchange

EXHIBIT “A”

IN THE SUPREME COURT OF PENNSYLVANIA

JOSEPH TAMBELLINI, INC. d/b/a JOSEPH **No. 52 WM 2020**
TAMBELLINI RESTAURANT,

Petitioner

v.

ERIE INSURANCE EXCHANGE,

Respondent.

**SPONSOR ATTORNEY'S VERIFIED STATEMENT PURSUANT TO PENNSYLVANIA
RULE OF CIVIL PROCEDURE 1012.1(d)(2)**

COMES NOW, Plaintiff, Erie Insurance Exchange, by and through its attorneys, DiBella, Geer, McAllister, & Best, PC and Tara L. Maczuzak and files the following Sponsor Attorney's Verified Statement Pursuant to Pennsylvania Rule of Civil Procedure 1012.1(d)(2);

1. The undersigned is counsel of record in the above-captioned matter for Erie Insurance Exchange whom Adam J. Kaiser seeks to represent pursuant to Admission *Pro Hac Vice*.

2. Should be Admission *Pro Hac Vice* Motion be granted, the undersigned will remain attorney of record for Erie Insurance Exchange.

3. After reasonable investigation, the undersigned believes Adam J. Kaiser to be a reputable and competent attorney and is in a position to recommend Adam J. Kaiser's admission.

4. Other than the instant action, the undersigned is acting as a sponsor of other candidates for Admission *Pro Hac Vice* in a Pennsylvania court in the pending action in the Court of Common Pleas of Allegheny County *EQC Operating Trust, et al v. DJI Technology, Inc., et al*, GD 18-014354 of Morgan Smith and George Pilja.

5. Any proceeds from a settlement of a cause of action in which Adam J. Kaiser is granted admission *Pro Hac Vice* shall be received, held and distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

6. I, the undersigned, verify that the statements made above are true and correct to the best of my information, knowledge and belief. I understand that false statements herein are made subjects to the penalty of 18 Pa.C.S.A., Section 4904, relating to unsworn falsification to authorities.

Respectfully submitted,

DiBella, Geer, McAllister & Best, P.C.

BY: /s/ Tara L. Maczuzak

Tara L. Maczuzak
Pa. I.D. No. 86709
DiBella, Geer, McAllister & Best, PC
20 Stanwix Street, 11th Floor
Pittsburgh, PA 15222

412.261.2900-Telephone
412.261.3222-Facsimile

Attorney for Plaintiff,
Erie Insurance Exchange

EXHIBIT “B”

IN THE SUPREME COURT OF PENNSYLVANIA

JOSEPH TAMBELLINI, INC. d/b/a JOSEPH TAMBELLINI RESTAURANT, No. 52 WM 2020

Petitioner

v.

ERIE INSURANCE EXCHANGE,

Respondent.

**VERIFIED STATEMENT OF ADAM KAISER IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

Adam Kaiser declares the following under the penalties of perjury pursuant to 18 Pa.C.S. Section 4904.

1. I am an attorney at the law firm of Alston & Bird, and maintain an office at 90 Park Avenue, 15th Floor, New York, NY.

2. I have been a member in good standing of the bar of the State of New York since 1993, my New York Attorney Identification Number is 2571834.

3. I have never been suspended, disbarred, or otherwise disciplined in any jurisdiction.

4. I have never been subject to any disciplinary proceedings in any jurisdiction.

5. I have never applied for nor been denied Admission *Pro Hac Vice* in any Pennsylvania Court.

6. I agree that I shall comply with and be bound by the applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

7. I shall submit to the jurisdiction of the Pennsylvania Courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the representation of Respondent, Erie Insurance Exchange.

8. I have consented to the appointment of Tara L Maczuzak, Esquire, of the firm of DiBella, Geer, McAllister & Best as the agent upon whom service of process shall be made for all actions, including disciplinary actions that may arise out of the practice of law in this action.

I, the undersigned, verify that the statements set forth above are true and correct to the best of my information, knowledge and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A, Section 4904 relating to unsworn falsification to authorities.


ADAM KAISER

May 5, 2020
Date

EXHIBIT “C”



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

May 05, 2020

ADAM JAY KAISER, Esq.
ALSTON & BIRD LLP
90 PARK AVENUE
NEW YORK, NY 10024

SENT TO ADAM KAISER VIA Email: ADAM.KAISER@ALSTON.COM

Dear Attorney KAISER:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as Joseph Tambellini v. Erie Insurance Co, no. NO. 52 WM 2020, filed in the Supreme Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart
Executive Director

cc: TARA L. MACZUZAK, Esq.
TMaczuzak@dgmblaw.com

Pennsylvania Judicial Center
601 Commonwealth Ave., Ste. 2400
PO Box 62445, Harrisburg, PA 17106-2445
717/238-2001 · 888/PA-IOLTA (724-6582) · 717/238-2003 FAX
paiolta@pacourts.us · www.paiolta.org