

**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

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**MOTION FOR ADMISSION PRO HAC VICE OF**  
**ELIZABETH HELMER**

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

*Counsel for Erie Insurance Exchange*

Date: May 6, 2020

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**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 ELIZABETH HELMER**

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 Elizabeth Helmer of Alston & Bird, as co-counsel for Erie Insurance Exchange, in the above matter and in support of that Motion avers as follows:

1. Elizabeth Helmer is an attorney at the law firm of Alston & Bird, and maintains an office at One Atlantic Center, 1201 West Peachtree, Atlanta, GA 30309. She is to be co-counsel for Respondent, Erie Insurance Exchange.

2. Elizabeth Helmer has been a member in good standing of the Georgia State Bar since 2007. She is also a member in good standing of the following courts:

a. Georgia Court of Appeals - 2007

- b. Georgia Supreme Court - 2007
  - c. Eleventh Circuit Court of Appeals – 2015
  - d. Tenth Circuit Court of Appeals – 2016
  - e. Ninth Circuit Court of Appeals- 2011
3. Elizabeth Helmer has not been the subject of disciplinary action in any court.
4. Elizabeth Helmer agrees to be subject to the jurisdiction of this Court for the purposes of representing Erie Insurance Exchange in this action.
5. Tara L. Maczuzak and DiBella, Geer, McAllister & Best, PC will continue to act as counsel of record for Erie Insurance Exchange.
6. Attached hereto as Exhibit “A” is the Undersigned’s Verified Statement pursuant to the Pennsylvania Rule of Civil Procedure 1012.1(d)(2).
7. Attached hereto as Exhibit “B” is the Verified Statement of Elizabeth Helmer as required by Pennsylvania Rule of Civil Procedure 1012.1(c)(1).
8. 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 Elizabeth Helmer.

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

Respectfully submitted,

BY: /s/ *Tara L. Maczuzak*

Tara L. Maczuzak  
Pa. I.D. No. 86709  
DiBella, Geer, McAllister & Best, PC  
20 Stanwix Street, 11<sup>th</sup> 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 TAMBELLINI  
RESTAURANT,

**No. 52 WM 2020**

Petitioner

v.

ERIE INSURANCE EXCHANGE,

Respondent.

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

COMES NOW, Respondent, 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 Elizabeth Helmer seeks to represent pursuant to Admission *Pro Hac Vice*.

2. Should the 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 Elizabeth Helmer to be a reputable and competent attorney and is in a position to recommend Elizabeth Helmer'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 pending actions in Pennsylvania courts: 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 and the instant action of Adam J. Kaiser.

5. Any proceeds from a settlement of a cause of action in which Elizabeth Helmer 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, 11<sup>th</sup> Floor

Pittsburgh, PA 15222

412.261.2900-Telephone

412.261.3222-Facsimile

Attorney for Respondent,  
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 ELIZABETH HELMER IN SUPPORT OF  
MOTION FOR ADMISSION PRO HAC VICE**

Elizabeth Helmer 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 One Atlantic Center, 1201 West Peachtree, Atlanta, GA 30309.
2. I have been a member in good standing of the bar of the State of Georgia since 2007, and my Georgia Attorney Identification Number is 415161.
3. I am also a member in good standing for the Georgia Supreme Court and have been since 2007.
4. I have never been suspended, disbarred, or otherwise disciplined in any jurisdiction.

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

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

7. 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.

8. 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.

9. I have consented to the appointment of Tara L Maczuzak, Esquire, of the firm of DiBella, Geer, McAllister & Best, PC 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.

/s/ Elizabeth Helmer  
ELIZABETH HELMER

May 5, 2020  
Date

# EXHIBIT “C”



SUPREME COURT OF PENNSYLVANIA  
PENNSYLVANIA INTEREST ON  
LAWYERS TRUST ACCOUNT BOARD

May 07, 2020

ELIZABETH HELMER, Esq.  
ALSTON & BIRD LLP  
ONE ATLANTIC CENTER  
1201 WEST PEACHTREE ST.  
ATLANTA, GA 30309-3424

SENT TO TARA MACZUZAK VIA Email: TMACZUZAK@DGMBLAW.COM

Dear Attorney HELMER:

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, Inc., D/B/A Joseph Tambellini Restaurant v. Erie Insurance Exchange, 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

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