

STATE OF WISCONSIN COURT OF APPEALS DIST. IV

In the Matter of the Rehabilitation of:

**SEGREGATED ACCOUNT OF
AMBAC ASSURANCE CORPORATION**

**Appeal of the United States of America:
Appeal No. 2011AP516**

**MOTION FOR THE ADMISSION OF
ANTHONY T. SHEEHAN *PRO HAC VICE*
AS COUNSEL FOR THE UNITED STATES**

I, Richard Humphrey, Assistant United States Attorney in the Office of the United States Attorney for the Western District of Wisconsin, have appeared for the United States, the appellant in the above-captioned appeal. I respectfully move the Court to admit Anthony T. Sheehan *pro hac vice* as additional counsel for

the United States. This motion is supported by Mr. Sheehan's affidavit, which is submitted with this motion.

Respectfully submitted,

/s/ Richard D. Humphrey

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Dated this 21st day of March, 2011.

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In the Matter of the Rehabilitation of:

**SEGREGATED ACCOUNT OF
AMBAC ASSURANCE CORPORATION**

**Appeal of the United States of America:
Appeal No. 2011AP516**

**AFFIDAVIT IN SUPPORT OF THE MOTION
FOR THE ADMISSION OF ANTHONY T. SHEEHAN
PRO HAC VICE AS COUNSEL FOR THE UNITED STATES**

I, Anthony T. Sheehan, submit this affidavit in support of the motion for my admission *pro hac vice* as additional counsel for the United States, the appellant in the above-captioned appeal.

1. I am an attorney in good standing admitted to practice in the State of Illinois (Illinois bar number 6210019). I have also been admitted to the bars of the United States Supreme Court and of the United States Courts of Appeals for the First, Second, Fourth, Fifth, Seventh, Ninth, Tenth, and District of Columbia Circuits. I have also represented the Federal Government in the United States Courts of Appeals for the Third, Sixth, Eighth,

Eleventh, and Federal Circuits, which do not require Government counsel to join their circuit bars when representing the United States, its agencies, or its employees.

2. I have not been suspended or disbarred, and no disciplinary complaints have been filed against me.

3. I am employed by the Appellate Section of the Tax Division of the United States Department of Justice. My contact information is as follows:

Anthony T. Sheehan
Attorney, Tax Division
United States Dep't of Justice
P.O. Box 502
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Telephone: (202) 514-4339
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Anthony.T.Sheehan@usdoj.gov

4. I do not practice or hold out to practice law in the State of Wisconsin. I have not applied previously for admission *pro hac vice* in the courts of the State of Wisconsin. I seek admission only for purposes of representing the interests of the United States in the above-captioned appeal. *See* 28 U.S.C. § 517 (Attorney General may send any officer of the Department of Justice to

attend to the United States' interests in any suit pending in federal or state court).

5. I have read and will comply with Wisconsin Supreme Court Rule 10.03(4). My representation of the United States will be conducted in association with Assistant United States Attorney Richard Humphrey (Wisconsin bar number 1016934), an active member of the State Bar of Wisconsin who has appeared for the United States in the instant appeal. We are seeking by an additional motion filed today, however, two waivers of the requirements of that rule. First, we are seeking a waiver allowing me to sign the papers filed in your Court on behalf of the United States without also obtaining Mr. Humphrey's signature on those papers. Second, pursuant to Tax Division policy, we are seeking the waiver of the \$50 *pro hac vice* application fee. I will await the Court's ruling on that motion before submitting the application fee to the Office of Lawyer Regulation.

6. I acknowledge the jurisdiction of the courts of the State of Wisconsin over my professional conduct. I agree to abide by

the Rules of Professional Conduct for Attorneys and the Rules of this Court, if I am admitted *pro hac vice*.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and belief. Executed this 22d day of March, 2011, in Washington, D.C.

/s/ Anthony T. Sheehan

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CERTIFICATE OF SERVICE

I hereby certify that, on this 22d day of March, 2011, that a true and correct copy of the foregoing document has been served upon counsel for the Wisconsin insurance commissioner via First Class Mail, with postage prepaid, in an envelope properly addressed as follows:

Matthew R. Lynch, Esquire
Michael B. Van Sicklen, Esquire
Foley & Lardner
P.O. Box 1497
Madison, WI 53701

I further certify that a true and correct copy of the foregoing document (except for replacing handwritten dates and signatures with typed versions of the same) has been served on all counsel of record using the e-mail distribution list established by the Circuit Court for Dane County for that purpose, as listed below:

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/s/ Anthony T. Sheehan

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