

DOCKET NO.: NNH-CV-14-6050848-S

ZHAOYIN WANG,	:	SUPERIOR COURT
Plaintiff,	:	
	:	
v.	:	J.D. OF NEW HAVEN
	:	
BETA PHARMA, INC., DON ZHANG AND	:	
ZHEJIANG BETA PHARMA CO., LTD.,	:	
Defendants.	:	MAY 6, 2016

APPLICATION FOR ADMISSION PRO HAC VICE
OF JACK L. KOLPEN

Pursuant to Practice Book § 2-16, Michael G. Caldwell, representing defendants Beta Pharma, Inc. and Don Zhang (collectively, "Defendants"), and a member in good standing of the bar of this Court, moves for an order permitting Jack L. Kolpen, a member in good standing of the New Jersey Bar, to be admitted pro hac vice to represent Defendants in this case, and specifically, to participate in the presentation of Defendants' cause in this Court, including participation in the trial of this action.

In support of this application, the undersigned sponsoring attorney represents as follows:

1. Attorney Kolpen is a lawyer with the firm Fox Rothschild LLP, and practices at its office at Princeton Pike Corporate Center, 997 Lenox Drive, Building 3, Lawrenceville, NJ 08648-2311
2. Accompanying this motion is the duly sworn and executed affidavit of Attorney Kolpen setting forth all information required by Practice Book § 2-16. As stated in that affidavit, good cause exists for the admission of Attorney Kolpen, on the basis of

Defendants' welfare, because he has acquired specialized skill and knowledge with respect to Defendants' affairs important to the trial of this action.

3. An attorney or attorneys from the New Haven office of LeClairRyan, P.C. and/or Siegel, O'Connor, O'Donnell & Beck, P.C., who are members of the Connecticut Bar and have Appearances in this action, will be present on behalf of Defendants along with Attorney Kolpen at all proceedings, will sign all pleadings, briefs, and other papers filed with the Court, and will assume full responsibility for them and for the conduct of this cause and of Attorney Kolpen.

4. The granting of this motion will not affect the timing of any scheduled deadlines or hearings.

5. The client security fund fee has been paid on behalf of Attorney Kolpen, and the required filing fee of \$600.00 accompanies this application.

WHEREFORE, the undersigned sponsoring attorney respectfully requests that this application be granted.

/s/

Michael G. Caldwell (juris no. 421880)
LeClairRyan, A Professional Corporation
545 Long Wharf Drive, Ninth Floor
New Haven, Connecticut 06511
Telephone: (203) 672-1636
Facsimile: (203) 672-1656
Email michael.caldwell@leclairryan.com
-- Attorney for Defendants Beta Pharma, Inc.
and Don Zhang --

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**AFFIDAVIT OF JACK L. KOLPEN IN SUPPORT OF
APPLICATION FOR ADMISSION PRO HAC VICE**

I, Jack L. Kolpen, being duly sworn, depose and say:

1. I am over the age of eighteen (18) and believe in the obligations of an oath.
2. I submit this affidavit in support of the Application from Michael G. Caldwell seeking my admission to the bar of this Court pro hac vice to represent defendants Beta Pharma, Inc. and Don Zhang ("Defendants") pursuant to Practice Book § 2-16.
3. I am a partner with the law firm of Fox Rothschild, LLP, which maintains an office at Princeton Pike Corporate Center, 997 Lenox Drive, Building 3, Lawrenceville, NJ 08648-2311. My telephone number at Fox Rothschild is (609) 895-3304, my facsimile number is (609) 896-1469, and my email address is JKolpen@foxrothschild.com.
4. I am a member in good standing of the State Bar of New Jersey (Bar no. 026411987) and the Supreme Court of Pennsylvania (Bar no. 309417). I am also admitted to practice before the United States District Courts for the District of New

Jersey and the Eastern District of Pennsylvania. These courts do not issue public bar identification numbers.

5. I have no grievance pending against me in any jurisdiction. I have never been reprimanded, suspended, placed on inactive status, disbarred, or otherwise disciplined. I have never resigned from the practice of law.

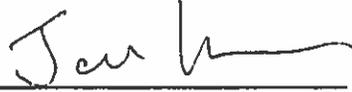
6. I have paid the Connecticut client security fund fee for calendar year 2015.

7. I hereby designate the Chief Clerk of the Superior Court of Connecticut, Judicial District of New Haven, as my agent upon whom all process and notice may be served.

8. I agree to register with the Statewide Grievance Committee in accordance with the provisions of the Connecticut Practice Book while appearing in Connecticut in this matter and for two years after the completion of this matter, and to notify the Statewide Grievance Committee at the expiration of the two year period.

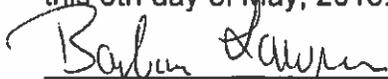
9. I am appearing pro hac vice in Xie v. Beta Pharma, No. UWY-CV-13-6050848. I have not appeared in any other action in the Superior Court of Connecticut.

10. Good cause exists for my admission, on the basis of Defendants' welfare, because I have acquired specialized skill and knowledge with respect to Defendants' affairs important to the trial of this action.



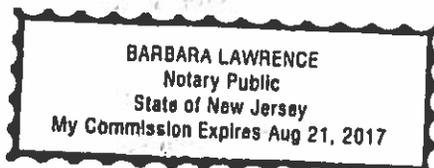
Jack L. Kolpen

Subscribed and sworn to before me
this 6th day of May, 2016.



Notary Public/Commissioner of the Superior Court

My commission expires:



CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following counsel of record by email this 6th day of May, 2016.

Jonathan Katz, Esq.
Jacobs & Dow, LLC
350 Orange Street
New Haven, CT 06511
jkatz@jacobsllaw.com

/s/
Michael G. Caldwell (juris no. 421880)