

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

ZHAOYIN WANG, Plaintiff,	:	SUPERIOR COURT
	:	
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 BENJAMIN R. KURTIS**

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 Benjamin R. Kurtis, 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 Kurtis 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 Kurtis setting forth all information required by Practice Book § 2-16. As stated in that affidavit, good cause exists for the admission of Attorney Kurtis, 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 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 Kurtis 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 Kurtis.

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

5. The client security fund fee has been paid on behalf of Attorney Kurtis, 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](mailto:michael.caldwell@leclairryan.com)  
-- Attorney for Defendants Beta Pharma, Inc.  
and Don Zhang --

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**AFFIDAVIT OF BENJAMIN R. KURTIS IN SUPPORT OF  
APPLICATION FOR ADMISSION PRO HAC VICE**

I, Benjamin R. Kurtis, 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 an associate 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) 895-3303, my facsimile number is (609) 896-1469, and my email address is BKurtis@foxrothschild.com.
4. I am a member in good standing of the State Bar of New Jersey (Bar no. 029492010) and of the Bar of the Supreme Court of Pennsylvania (Bar no. 51271). I

am also admitted to practice before the United States District Court for the District of New Jersey. This court does 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.

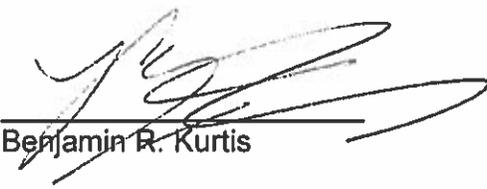
6. I have paid the Connecticut client security fund fee for calendar year 2015.

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.

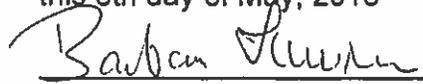
8. I agree to register with the Statewide Grievance Committee in accordance with the provisions of the Connecticut Practice Book while appearing in Connecticut in this matter and for two years after the completion of this matter, and to notify the Statewide Grievance Committee at the expiration of the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

  
Benjamin R. Kurtis

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

  
Notary Public/Commissioner of the Superior Court

My commission expires:

BARBARA LAWRENCE  
Notary Public  
State of New Jersey  
My Commission Expires Aug 21, 2017

**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)