

DOCKET NO. UWY-CV-14-6026552-S : SUPERIOR COURT
NUCAP INDUSTRIES INC., ET AL., : J.D. WATERBURY
VS. : AT WATERBURY
PREFERRED TOOL AND DIE, INC., ET AL., : OCTOBER 25, 2016

APPLICATION TO ADMIT ATTORNEY
SHANNON HAMPTON SUTHERLAND

Pursuant to Connecticut Practice Book § 2-16, the undersigned applies to admit Shannon Hampton Sutherland, an attorney who is not a member of the bar of the State of Connecticut, to appear *pro hac vice* in order to represent the plaintiffs, Nucap Industries, Inc. and Nucap US, Inc., in this action. In support of this application, the undersigned counsel of record states as follows:

1. Attorney Shannon Hampton Sutherland is a member in good standing of the bar of the Commonwealth of Pennsylvania and the State of New Jersey, as established by her affidavit attached hereto as Exhibit A.

2. Attorney Sutherland is a Partner with the law firm of Duane Morris LLP, located at 30 South 17th Street, Philadelphia, Pennsylvania 19103-4196. Her telephone number is 215979-1104; her fax number is 215-689-4956. Her email address is SHSutherland@duanemorris.com.

3. Attorney Sutherland has never been censured or disciplined by any court before which she has appeared, is not subject to any pending grievances, and has not been disqualified

from appearing before a court of the State of Connecticut. She also has never resigned from the practice of law in any jurisdiction, and has never been reprimanded, suspended, placed on inactive status, or disbarred.

4. The undersigned states that good cause exists to allow Attorney Sutherland to appear on behalf of the plaintiffs in this action. This application is made at the request of the plaintiffs and, where possible, a client's choice of counsel should be respected. Duane Morris LLP has a long-standing relationship with the plaintiffs and Ms. Sutherland's practice area focuses on litigating commercial disputes involving covenants not to compete, trade secrets, and related matters. The plaintiffs would be prejudiced if they were deprived of the history of experience and knowledge possessed by her. Therefore, plaintiffs and the Court will be well-served by the involvement of her in this case and her ability to represent and safeguard plaintiffs' interests before this Court.

4. The undersigned further represents that he or another attorney from Robinson & Cole LLP, who is a member of the bar of the State of Connecticut, will be present at all Court proceedings, will sign all pleadings, briefs, or other papers filed with the Court, and will assume full responsibility for such papers and the conduct of the case and of Attorney Sutherland, as required by the Connecticut Practice Book § 2-16.

WHEREFORE, the undersigned respectfully requests that the Court grant this application and permit Attorney Shannon Hampton Sutherland to appear *pro hac vice* in this matter on behalf of the plaintiffs.

Dated at Hartford, Connecticut this 25th day of October 2016.

PLAINTIFFS,
NUCAP INDUSTRIES INC. and
NUCAP US INC.

By /s/Stephen W. Aronson
Stephen W. Aronson
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Their Attorneys

CERTIFICATION

This is to certify that a copy of the foregoing Application was mailed, postage prepaid or delivered electronically or non-electronically, on this 25th day of October 2016 to all counsel and self-represented parties of record, as follows:

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/s/Stephen W. Aronson
Stephen W. Aronson

Exhibit A

NO. UWY-CV-14-6026552-S : SUPERIOR COURT
NUCAP INDUSTRIES INC., ET AL. : J.D. WATERBURY
VS. : AT WATERBURY
PREFERRED TOOL AND DIE, INC., ET AL. : OCTOBER 24, 2016

AFFIDAVIT OF ATTORNEY
SHANNON HAMPTON SUTHERLAND

I, Shannon Hampton Sutherland, being duly sworn, swear the following to be true:

1. I am over the age of eighteen (18) years, and I understand the obligations of an oath. The statements contained in this Affidavit are based on my personal knowledge. This Affidavit is submitted in support of an application to admit counsel as a visiting attorney in the above-captioned matter.

2. I certify that I have no grievances pending against me in the State of Connecticut or in any other jurisdiction; I have never been reprimanded, suspended, placed on inactive status, disbarred, or otherwise disciplined; nor have I ever resigned from the practice of law.

3. I am a member in good standing of the bars in the: (1) Commonwealth of Pennsylvania; (2) State of New Jersey; (3) United States District Court for the Eastern District of Pennsylvania; (4) United States District Court for the District of New Jersey; (5) United States Court of Appeals for the First Circuit; and (6) United States Court of Appeals for the Third Circuit.

4. I certify that I have paid the client security fund fee due for the calendar year in which this motion has been made.

5. I designate the Chief Clerk of the Superior Court of the State of Connecticut for the Judicial District of Waterbury, in which I seek to be appearing, as my agent upon whom process and service of notice may be served.

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

Dated at Philadelphia, Pennsylvania this 24th day of October, 2016.


Shannon Hampton Sutherland

Subscribed and sworn to before me
this 20th day of October, 2016.



Notary Public

My Commission Expires:

