

DOCKET NO. FBT-CV-16-5032101-S

SUPERIOR COURT

JOHN DOE

J.D. OF FAIRFIELD

vs.

AT BRIDGEPORT

VILLA MARIA EDUCATION CENTER, ET AL.

NOVEMBER 21, 2016

Application for Admission Pro Hac Vice

Pursuant to Practice Book § 2-16, the undersigned attorney applies to admit Mark E. Chopko and Samantha Kats to appear in this action pro hac vice on behalf of the defendants.

The undersigned is a CT licensed attorney and member in good standing of the bar of the State of Connecticut. Attorneys Chopko and Kats are lawyers with the law firm of Stradley, Ronon, Stevens & Young, LLP. Attorney Chopko operates out of the firm's office located at 1250 Connecticut Avenue, N.W., Suite 500, Washington D.C. 20036, and Attorney Kats operates out of the firm's office located at 30 Valley Stream Parkway, Malvern, PA 19355. Attorney Chopko is member in good standing of the state bar of Pennsylvania and the bar of the District of Columbia and licensed to practice in said jurisdictions. Attorney Kats is a member in good standing of the state bars of Pennsylvania and New Jersey and licensed to practice in said jurisdictions.

With respect to need for pro hac vice admission in this matter, Stradley Ronon Stevens & Young acts as counsel to the defendants in at their Motherhouse in Reading, PA, and has served as defense counsel since February 2014. In addition, Mr. Chopko has served as defense counsel for religious institutions in hundreds of

matters dealing with alleged abuse and misconduct of clergy, sisters and lay employees and volunteers, and has authored several articles about the liability law implicated in these claims. Attorney Chopko was a participant in the Bishops' Conference, and was one of the staff drafters of the 2002 Dallas Charter for the Protection of Children and Young People. In light of his background, the defendants desire Attorney Chopko to represent them in this matter.

Similar to Attorney Chopko, Attorney Kats is also a necessary admission to Connecticut Courts via *pro hac vice* by reason of her longstanding attorney client relationship with the defendants that predates this cause of action and subject matter of the litigation at bar. Through her close work with the defendants and with Attorney Chopko, Attorney Kats has also acquired a specialized skill and knowledge with the respect to the defendants' affairs important to the trial and proceedings of this matter, the facts and background of the case and of the defendants themselves.

The undersigned submits the attached affidavits of Attorneys Chopko and Kats in support of this application.

The undersigned has been associated with the defendants and represents further that he, or another attorney, from the law firm of Danaher Lagnese, P.C., who are also members in good standing of the bar of the State of Connecticut, will be present 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 the attorney to whom such privilege of appearing in this matter *pro hac vice* is accorded. All appropriate fees paid for their admission have been paid on this date.

THE DEFENDANTS,

By: /s/ Jonathan A. Kocienda
Jonathan A. Kocienda
Juris No. 414585
Michael R. McPherson
DANAHER LAGNESE, PC
Their Attorneys

Certification

I hereby certify that a copy of the foregoing request was mailed first-class, postage pre-paid, on November 21, 2016 to all counsel and pro se parties of record as follows:

Cindy L. Robinson
Tremont, Sheldon, Robinson, Mahoney, P.C.
64 Lyon Terrace
Bridgeport, CT 06604

/s/ Jonathan A. Kocienda
Jonathan A. Kocienda

Attachments

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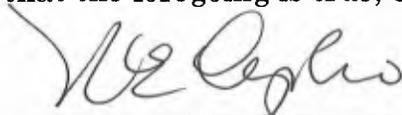
Affidavit of Mark E. Chopko, Esq.

Personally appeared, Mark E. Chopko, Esq., being duly sworn, deposes and says:

1. I am over the age of 18 and I understand and believe in the obligations of an oath.
2. I am an attorney with the law firm of Stradley, Ronon, Stevens & Young, LLP, 1250 Connecticut Avenue, N.W., Suite 500, Washington D.C. 20036, 202-822-9611. I make this Affidavit in support of my application to permit me to appear pro hac vice as counsel for the defendants in all proceedings in the above-captioned matter.
3. Stradley Ronon Stevens & Young acts as counsel to the defendant Sisters at their Motherhouse in Reading, PA, and served as defense counsel since February 2014. I have served as defense counsel for religious institutions in hundreds of matters around the country dealing with alleged abuse and misconduct of clergy, sisters and lay employees and volunteers. In addition, I have authored several articles about the liability law implicated in these claims, including matters dealing with misconduct claims in religious institutions. E.g., "Continuing the Lord's Work and Healing His People," 2004 BYU L. Rev. 1897 [<http://www.stradley.com/~media/Files/Publications/2004/12/Bringham%20Young%20University%20Law%20Review%20-%20Mark%20Chopko%20authored%20-%202007.pdf>]; "Stating Claims against Religious Institutions," 44 B.C. L. Rev. 1089 (2003) [<http://www.stradley.com/~media/Files/ResourcesLanding/Publications/2003/01/Stating%20Claims%20Against%20Religious%20Insti>

utions/Files/mec-statingclaimsbostonlaw/FileAttachment/mec-statingclaimsbostonlaw.pdf In previous employment as General Counsel of the United States Conference of Catholic Bishops, I was one of the staff drafters of the 2002 Dallas Charter for the Protection of Children and Young People.

4. I am a member in good standing of the state bar of Pennsylvania and the bar of the District of Columbia. I do not have a 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.
5. I have paid the client security fund fee due for the calendar year 2016.
6. I designate the chief clerk of the Judicial District of Fairfield at Bridgeport as my agent upon whom process and service of notice may be served.
7. I agree to register with the statewide grievance committee while appearing in this matter and for two years after the completion of this matter.
8. I agree to notify the statewide grievance committee of the expiration of the two-year period.
9. I appeared pro hac vice in one matter before the Connecticut Superior Court in 2008-09, Guerrier v. Southern New England Conference of Seventh-Day Adventists, KNL-CV-08-5007824-S. The case was disposed of on a motion to dismiss. I have not appeared pro hac vice in this state since that time.
10. I declare under penalty of perjury under the laws of the State of Connecticut that the foregoing is true, correct and accurate.



Mark E. Chopko

Subscribed and sworn to before me on November 17, 2016



Notary Public

CHERYL GARCIA
Notary Public, District of Columbia
My Commission Expires January 31, 2019



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Affidavit of Samantha B. Kats, Esq.

Personally appeared, Samantha B. Kats, Esq., being duly sworn, deposes and says:

1. I am over the age of 18 and I understand and believe in the obligations of an oath.
2. I am an attorney with the law firm of Stradley, Ronon, Stevens & Young, LLP, 30 Valley Stream Parkway, Malvern, PA 19355.
3. I am a member in good standing of the state bars of Pennsylvania and New Jersey.
3. I do not have a grievance pending against me in any jurisdiction.
4. I have never been reprimanded, suspended, placed on inactive status, disbarred or otherwise disciplined.
5. I have never resigned from the practice of law.
6. I have paid the client security fund fee due for the calendar year 2016.
7. I designate the chief clerk of the Judicial District of Fairfield at Bridgeport as my agent upon whom process and service of notice may be served.
8. I agree to register with the statewide grievance committee while appearing in this matter and for two years after the completion of this matter.

9. I agree to notify the statewide grievance committee of the expiration of the two-year period.
10. I have not previously appeared pro hac vice in this state.
11. I declare under penalty of perjury under the laws of the State of Connecticut that the foregoing is true, correct and accurate.



Samantha B. Kats, Esq.

Subscribed and sworn to before me on November 16, 2016



Notary Public

