

NO. NNH-CV14-6049044-S : SUPERIOR COURT
 :
NUCAP INDUSTRIES INC., ET AL. : J.D. NEW HAVEN
 :
VS. : AT NEW HAVEN
 :
PREFERRED TOOL AND DIE, INC., ET AL. : SEPTEMBER 9, 2014

APPLICATION TO ADMIT ATTORNEY HARRY M. BYRNE

Pursuant to Connecticut Practice Book § 2-16, the undersigned applies to admit Harry M. Byrne, 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 Harry M. Byrne is a member in good standing of the bar of the Commonwealth of Pennsylvania and the State of New Jersey, as established by his affidavit.
2. Attorney Byrne is an associate with the law firm of Duane Morris LLP, located at 30 South 17th Street, Philadelphia, Pennsylvania 19103-4196. His telephone number is 215-979-1136; his fax number is 215-689-3925. His email address is HMByrne@duanemorris.com.
3. Attorney Byrne has never been censured or disciplined by any court before which he has appeared, is not subject to any pending grievances, and has not been disqualified from appearing before a court of the State of Connecticut. He 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 Byrne 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 Mr. Byrne'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 him. Therefore, plaintiffs and the Court will be well-served by the involvement of him in this case and his ability to represent and safeguard plaintiffs' interests before this Court.

5. Attorney Byrne currently appears *pro hac vice* in the Superior Court of this state in a certain lawsuit captioned Robert S. Bosco, Jr. v. Eyelet Tech Nucap Corp., et al, No. UWY-CV14-6023433-S, pending in the Judicial District of Waterbury at Waterbury. As he currently appears *pro hac vice* in a matter involving the same and similar parties, good cause exists for granting this application, which will allow his representation of the plaintiffs in this matter.

6. 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 Byrne, as required by the Connecticut Practice Book § 2-16.

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

Dated at Hartford, Connecticut this 9th day of September, 2014.

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 9th day of September, 2014 to all counsel and self-represented parties of record, as follows:

Stephen J. Curley, Esq.
Brody Wilkinson, P.C.
2507 Post Road
Southport, CT 06890

David A. DeBassio, Esq.
Hinckley Allen & Snyder LLP
20 Church Street
Hartford, CT 06103

/s/Stephen W. Aronson
Stephen W. Aronson

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PREFERRED TOOL AND DIE, INC., ET AL. : SEPTEMBER 4, 2014

AFFIDAVIT OF ATTORNEY HARRY M. BYRNE

I, Harry M. Byrne, 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 bar in the Commonwealth of Pennsylvania and the State of New Jersey.

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 New Haven, 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.

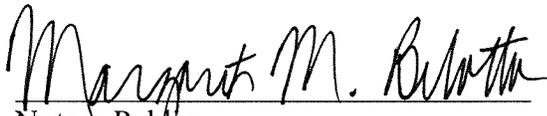
7. I currently appear *pro hac vice* in the Superior Court of this state in a certain lawsuit captioned Robert S. Bosco, Jr. v. Eyelet Tech Nucap Corp., et al, No. UWY-CV14-6023433-S, pending in the Judicial District of Waterbury at Waterbury. My PHV number is 435987.

Dated at Philadelphia, Pennsylvania this 4 day of September, 2014.



Harry M. Byrne

Subscribed and sworn to before me
this 4th day of September, 2014.



Notary Public
My Commission Expires:

