

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(Eastern Division)**

In re:

MODERN CONTINENTAL
CONSTRUCTION CO., INC.,

Debtor.

Chapter 11

Case No. 08-14558

MOTION FOR ADMISSION *PRO HAC VICE* FOR RICHARD M. KREMEN

Seaboard Surety Company, St. Paul Fire and Marine Insurance Company, St. Paul Guardian Insurance Company, St. Paul Mercury Insurance Company, United States Fidelity and Guaranty Company, Fidelity and Guaranty Insurance Underwriters, Inc., and Fidelity and Guaranty Insurance Company (collectively, the “Lender”), by and through their undersigned attorneys, hereby move this Court pursuant to Local Rule 9010-1(b) to admit attorney Richard M. Kremen *pro hac vice* to appear and practice in this Court in the above-captioned case as counsel for the Lender. As grounds for its motion, the Lender states as follows:

1. Attorney Richard M. Kremen is a partner in the law firm of DLA Piper US LLP, which has an office located at The Marbury Building, 6225 Smith Avenue, Baltimore, Maryland, 21209, with the telephone number of (410) 580-3000. He is a member in good standing of the bars of the State of Maryland and District of Columbia and has been admitted to practice in the United States District Court for the District of Maryland and United States District Court for the District of Columbia.

2. Mr. Kremen has no disciplinary proceedings pending against him in any jurisdiction.

3. Mr. Kremen is familiar with the issues in this case and with the Local Rules of this Court.

WHEREFORE, the Lender respectfully requests that this Court permit Richard M. Kremen to appear *pro hac vice* before this Court.

Respectfully submitted,

SEABOARD SURETY COMPANY, ST. PAUL FIRE AND MARINE INSURANCE COMPANY, ST. PAUL GUARDIAN INSURANCE COMPANY, ST. PAUL MERCURY INSURANCE COMPANY, UNITED STATES FIDELITY AND GUARANTY COMPANY, FIDELITY AND GUARANTY INSURANCE UNDERWRITERS, INC., AND FIDELITY AND GUARANTY INSURANCE COMPANY

By: /s/ Matthew J. Iverson
Michael D. Vhay (BBO #566444)
Matthew J. Iverson (BBO #653880)
DLA PIPER US LLP
33 Arch Street, 26th Floor
Boston, MA 02110-1447
matthew.iverson@dlapiper.com (e-mail)
(617) 406-6000 (telephone)
(617) 406-6100 (facsimile)

-and-

Richard M. Kremen (Md. Fed. Bar #00532)
Jodie E. Buchman (Md. Fed. Bar #26004)
DLA PIPER US LLP
The Marbury Building
6225 Smith Avenue
Baltimore, MD 21209
richard.kremen@dlapiper.com (e-mail)
(410) 580-3000 (telephone)
(410) 580-3001 (facsimile)

Dated: June 24, 2008

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of June 2008, a copy of the foregoing *Motion for Admission Pro Hac Vice for Richard M. Kremen* was sent by electronic mail and/or first-class mail, postage prepaid to:

Harold B. Murphy, Esq.
Hanify & King, PC
One Beacon Street, 21st Floor
Boston, MA 02108-3107
bankruptcy@hanify.com (*e-mail*)

John P. Fitzgerald, III, Esq.
Assistant U.S. Trustee
Office of the U.S. Trustee
10 Causeway Street
Boston, MA 02222
john.p.fitzgerald@usdoj.gov (*e-mail*)

/s/ Matthew J. Iverson

Matthew J. Iverson