

**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 JODIE E. BUCHMAN**

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 Jodie E. Buchman *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 Jodie E. Buchman is an associate 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. She 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. Ms. Buchman has no disciplinary proceedings pending against her in any jurisdiction.

3. Ms. Buchman 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 Jodie E. Buchman 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  
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-and-

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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 Jodie E. Buchman* was sent by electronic mail and/or first-class mail, postage prepaid to:

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/s/ Matthew J. Iverson \_\_\_\_\_

Matthew J. Iverson