

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

In re:)	
)	
MODERN CONTINENTAL)	Chapter 11
CONSTRUCTION CO., INC.,)	
)	Case No. 08-14558
Debtor.)	
)	

MOTION FOR ADMISSION *PRO HAC VICE* FOR DAVID C. DREIFUSS

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 David C. Dreifuss *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 David C. Dreifuss is a partner in the law firm of Dreifuss Bonacci & Parker LLP, 26 Columbia Turnpike, Florham Park, New Jersey, 07932 with the telephone number of (973) 514-1414. He is a member in good standing of the bar of the State of New Jersey and has been admitted to practice in the United States District Court for the District of New Jersey, United States District Court for the Southern District of New York, United States District Court for the Eastern District of New York, United States District Court for the Northern District of New York, and the United States District Court for the Western District of New York.

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

3. Mr. Dreifuss 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 David C. Dreifuss to appear *pro hac vice* before this Court.

Dated: December 15, 2008

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 Guaranty Insurance Company*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
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MODERN CONTINENTAL)	
CONSTRUCTION CO., INC.,)	Case No. 08-14558 (WCH)
)	
Debtor.)	
)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of December, 2008, a copy of the foregoing Motion for Admission *Pro Hac Vice* of David C. Dreifuss was sent by electronic mail and/or first-class mail postage prepaid to the individuals or parties listed on the attached service list, in the manner there shown.

/s/ Matthew Iverson

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Dated: December 15, 2008

SERVICE LIST
In re Modern Continental Construction Co.
Case No. 08-14558-WCH

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