

ATTORNEYS AT LAW

August 2, 2024

RICHARD P. DRISCOLL T 603.695.8552 RDRISCOLL@DEVINEMILLIMET.COM

VIA HAND DELIVERY

Matthew Pollack, Esq. Clerk of the Law Court Maine Supreme Judicial Court 205 Newbury Street, Room 139 Portland, ME 04101

Re: Peter Masucci, et al. v. Judy's Moody LLC, et al.

Law Court Docket No. CUM-2024-82

Dear Clerk Pollack:

Enclosed for filing in the above-referenced matter, please find an original and one copy of the following:

- 1. Motion for Admission of Visiting Attorney *Pro Hac Vice* with Incorporated Memorandum of Law; and
- 2. Affidavit in Support of Motion for Admission *Pro Hac Vice* (Richard P. Driscoll, Esq.).

Also enclosed is a check in the amount of the required filing fee (\$700).

Copies of the enclosed are being served via electronic service and via U.S. Mail upon the *pro se* party noted below.

Thank you for your assistance in this matter.

Very truly yours,

Richar P. Driscoll

RPD/sel Enclosures

cc: Benjamin E. Ford

Keith P. Richard Orlando Delogu

Paige E. Gilliard Lauren E. Parker

David P. Silk

Joseph G. Talbot Gordon R. Smith RECD ME SUPREME JUD CT AUG 2'24 PM3:30

STATE OF MAINE

SUPREME JUDICIAL COURT SITTING as the LAW COURT Docket No. CUM-2024-82

PETER and KATHY MASUCCI)
et al.,) MOTION FOR ADMISSION
Plaintiffs/Appellants) OF VISITING ATTORNEY
) PRO HAC VICE
v.) WITH INCORPORATED
) MEMORANDUM OF LAW
JUDY'S MOODY LLC, et al.,)
) (Title to Real Estate Involved)
Defendants/Appellees)

Undersigned counsel for *amicus curiae*, Joan Bissonnette, moves this Court pursuant to 4 M.R.S. § 802, M.R. App. 2A(b)(2)(C), and M.R. Civ. P. 89(b), for an order admitting Richard P. Driscoll of the law firm Devine, Millimet & Branch, P.A., 111 Amherst Street, Manchester, NH 03101, email: rdriscoll@devinemillimet.com, a member in good standing of the Bar of the State of New Hampshire and the Commonwealth of Massachusetts, and an attorney before the courts of those states and the United States District Court for the District of New Hampshire, and the United States Court of Appeals for the First Circuit, to appear as a visiting attorney *pro hac vice* on behalf of *amicus curiae* Joan Bissonnette.

I certify that I am a member in good standing of the Bar of the State of Maine, and that I am actively associated with Richard P. Driscoll in this appeal.

This motion is supported by the affidavit of Richard P. Driscoll filed contemporaneously with this motion.

WHEREFORE, *amicus curiae*, Joan Bissonnette respectfully moves for the admission of Richard P. Driscoll, Esq. as a visiting attorney to work in association with the undersigned in this appeal.

Respectfully submitted,

JOAN BISSONNETTE,

By her attorneys,

DEVINE MILLIMET & BRANCH P.A.

Dated: August 2, 2024 By:

/s/ Suzanne Brunelle Suzanne Brunelle (Bar No. 5767) 111 Amherst Street Manchester, NH 03101

(603) 669-1000

sbrunelle@devinemillimet.com

CERTIFICATE OF SERVICE

I certify that a copy of this motion has been served on counsel for the parties listed below in accordance with M.R. App. P. 10(b) and M.R. Civ. P. 5(b).

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Gordon R. Smith Verrill Law, LLP One Portland Square Portland, ME 04101 gsmith@verrill-law.com

Dated: August 2, 2024 By: /s/ Suzanne Brunelle

Suzanne Brunelle

SUPREME JUDICIAL COURT SITTING as the LAW COURT Docket No. CUM-2024-82

) AFFIDAVIT IN SUPPORT OF
) MOTION FOR ADMISSION
) PRO HAC VICE
) (Title to Real Estate Involved)

- I, Richard P. Driscoll, of New Hampshire, state under oath as follows:
- 1. I am an attorney residing in Windham, New Hampshire, and an attorney at the law firm Devine, Millimet & Branch, P.A. I am a member in good standing of the Bar of the State of New Hampshire and the Bar of the Commonwealth of Massachusetts, and have been admitted to practice in the following courts as of the dates indicated in parentheses:
- New Hampshire (Dec. 18, 2020)
- U.S. District Court for the District of New Hampshire (May 21, 2023)
- U.S. Court of Appeals for the First Circuit (June 22, 2023)
- Massachusetts (July 24, 2024)
 - 2. I have not been suspended or disbarred in any court.

3. In the course of this representation of *amicus curiae*, Joan Bissonnette, I will be associated with Suzanne Brunelle of the law firm Devine, Millimet & Branch, P.A., 111 Amherst Street, Manchester, NH 03101.

Dated: August 2, 2024

By:

Richard P. Driscoll

Devine, Millimet & Branch, P.A.

111 Amherst Street Manchester, NH 03101

(603) 669-1000

rdriscoll@devinemillimet.com

STATE OF NEW HAMPSHIRE COUNTY OF HILLSBOROUGH

The foregoing instrument was acknowledged before me on August 2, 2024 by Richard P. Driscoll.

Notary Public/Justice of the Peace

