

S.C. NO.: 19832 / S.C. NO.: 19833 : SUPREME COURT  
DONNA L. SOTO, ADMINISTRATRIX OF : STATE OF CONNECTICUT  
THE ESTATE OF VICTORIA L. SOTO, ET  
AL.  
PLAINTIFFS-APPELLANTS,  
VS. :  
BUSHMASTER FIREARMS : MAY 31, 2017  
INTERNATIONAL, LLC, A/K/A, ET AL.,  
DEFENDANTS-APPELLEES

**APPLICATION FOR PERMISSION FOR PAUL D. CLEMENT  
TO APPEAR PRO HAC VICE IN THIS APPEAL**

Pursuant to Practice Book §§ 62-8A, 66-2 and 66-3, the undersigned member in good standing of the Connecticut bar, Kenneth R. Slater, Jr., moves this Court to permit Paul D. Clement, an attorney who is not a member of the bar of the State of Connecticut ("Attorney Clement"), to appear *pro hac vice* on behalf of *amicus curiae* applicant National Rifle Association of America, Inc. ("NRA") on the appeal in this matter in this Court.

**I. Brief History of the Proceedings**

The undersigned respectfully refers the Court to the Brief History of the Case in the Application of NRA for leave to appear as *amicus curiae*.

**II. Legal Grounds for Application for Admission *Pro Hac Vice***

Pursuant to Practice Book § 62-8A(b), this Court has discretion to grant applications to appear *pro hac vice* for good cause even when Attorney Clement did not appear *pro hac vice* before the Superior Court.

**III. Factual Grounds for Application for Admission *Pro Hac Vice***

In support of this motion, the undersigned represents the following:

1. The undersigned is a Connecticut attorney with law offices located at Halloran & Sage LLP, 225 Asylum Street, Hartford, CT 06103.
2. Attorney Clement has law offices located at Kirkland & Ellis LLP, 655 Fifteenth Street NW, Washington, DC 20005.
3. Attorney Clement is a member in good standing of the bar of the United States Supreme Court, the Virginia and Wisconsin state bars and the bars of the District of Columbia, federal districts and circuits as set forth in the affidavit of Attorney Clement submitted in accordance with Practice Book Section 62-8A (b) attached as Exhibit A.
4. Proof of payment of Attorney Clement's payment of the client security fund as required by Practice Book Section 62-8A (b) is attached as Exhibit B.
5. Good cause exists to permit Attorney Clement to represent the client named above in the proceeding before this Court because of his work for it and knowledge of its positions.
6. The undersigned represents that he will, unless excused by the Court,
  - a. Be present at all proceedings and arguments.
  - b. Sign all pleadings, briefs or other papers filed with the Court.
  - c. Assume full responsibility for any such filings and for the conduct of the cause or proceeding and of the attorney to whom the *pro hac vice* privilege is accorded.

Respectfully submitted,

By: /s/ Kenneth R. Slater, Jr. (Juris #404736)

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## CERTIFICATION

I hereby certify that (1) a copy of the foregoing has been mailed or delivered electronically on May 31, 2017 to each counsel of record and to the trial judge as follows, in compliance with Practice Book § 62-7; (2) the copy of the foregoing being filed with the appellate clerk is a true copy of the foregoing that was submitted electronically; (3) the foregoing has been redacted or does not contain any names or other personal identifying information that is prohibited from disclosure by rule, statute, court order or case law and (4) the foregoing complies with all applicable rules of appellate procedure, including Practice Book §§ 62-8A, 66-2 and 66-3.

### *For the Plaintiffs-Appellants*

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Bushmaster Holdings, Inc., a/k/a  
Remington Arms Company, LLC, a/k/a;  
Remington Outdoor Company, Inc., a/k/a*

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By /s/ Kenneth R. Slater, Jr. (Juris #404736)  
Kenneth R. Slater, Jr.

## EXHIBIT A

S.C. NO.: 19832 / S.C. NO.: 19833 : SUPREME COURT  
DONNA L. SOTO, ADMINISTRATRIX OF : STATE OF CONNECTICUT  
THE ESTATE OF VICTORIA L. SOTO, ET  
AL.

PLAINTIFFS-APPELLANTS,

VS. :

BUSHMASTER FIREARMS : MAY 30, 2017  
INTERNATIONAL, LLC, ET AL.,

DEFENDANTS-APPELLEES

**AFFIDAVIT OF PAUL D. CLEMENT**  
**IN SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE**

Paul D. Clement of Washington, DC, being duly sworn, upon personal knowledge  
does hereby depose and say:

1. I am over the age of eighteen and understand the obligations of an oath.
2. I am a member of the law firm of Kirkland & Ellis LLP, 655 Fifteenth Street  
NW, Washington, DC 20005.
3. I have been a member in good standing of the following bars since my  
admission: the District of Columbia (admitted 05/03/1996); the Virginia State Bar (admitted  
10/06/1994); the Wisconsin State Bar (admitted 05/29/2003); the United States Supreme  
Court (admitted 01/24/2000); the United States Courts of Appeals for the First Circuit  
(admitted 08/06/2010); Second Circuit (admitted 11/10/2003); Third Circuit (admitted  
08/02/2011); Fourth Circuit (admitted 03/30/2000); Fifth Circuit (admitted 09/28/2009);

Sixth Circuit (admitted 03/02/2000); Seventh Circuit (admitted 01/09/2001); Eighth Circuit (admitted 09/03/1996); Ninth Circuit (admitted 06/14/2002); Tenth Circuit (admitted 03/22/2000); Eleventh Circuit (admitted 01/27/2009); Federal Circuit (admitted 04/19/2000); and District of Columbia Circuit (07/31/1996); United States Court of Federal Claims (admitted 11/03/2016); and the United States District Court for the District of Columbia (admitted 09/29/2009).

4. I hereby certify that there are no grievances pending against me in any other jurisdictions, and I have never been reprimanded, suspended, placed on inactive status or disbarred, nor have I ever resigned from the practice of law.

5. I have a significant attorney-client relationship with the National Rifle Association-Institute for Legislative Action ("NRA-ILA").

6. As a result of that relationship, I have acquired specialized skill and knowledge of the affairs of the NRA-ILA.

7. I hereby designate the Chief Clerk of the Superior Court for the Judicial District of Fairfield as my agent upon whom process and service of notice may be served.

8. I did not previously file an application pursuant to Section 2-16 of the Connecticut Practice Book to appear pro hac vice in the Connecticut Superior Court in connection with this matter.

9. I am one of two attorneys from my law firm who are now filing an application to appear pro hac vice in this matter. To the best of my knowledge, one additional attorney from my law firm intends to file an application to appear pro hac vice in this matter.

10. I agree to register with the Connecticut Statewide Grievance Committee in accordance with Chapter 2 of the Connecticut Practice Book while appearing in this matter in this state and for two years after the completion of this appeal.

11. I have paid the client security fund due this calendar year.

12. I have paid the filing fee for admission pro hac vice to the clerk of the Superior Court of the Judicial District of Fairfield at Bridgeport.

13. I have not previously appeared pro hac vice in the State of Connecticut.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge or belief.



Paul D. Clement

STATE OF WASHINGTON :  
COUNTY OF District of Columbia :

ss:

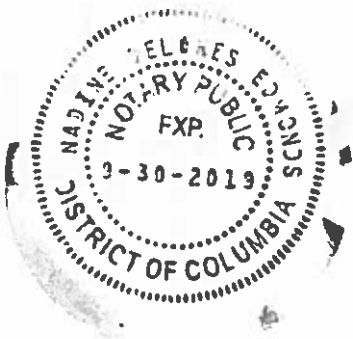
On this 30 day of May, 2017, then and there personally appeared Paul D. Clement, before the undersigned authority, who subscribed the foregoing and who swore to the truth of the statements contained herein.

Subscribed and Sworn to before  
me this 30 day of May, 2017

NADINE DELORES EDMONDS  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires September 30, 2019

Nadine Delores Edmonds

Notary Public



## EXHIBIT B

STATE OF CONNECTICUT



Judicial Branch

[www.jud.ct.gov](http://www.jud.ct.gov)

**CLIENT SECURITY FUND COMMITTEE**

Second Floor – Suite One

287 Main Street, East Hartford, CT 06118-1885

[Security.Fund@jud.ct.gov](mailto:Security.Fund@jud.ct.gov)

Christopher G. Blanchard  
Staff Attorney  
(860) 568-3450

May 30, 2017

Kirkland & Ellis LLP  
655 15<sup>th</sup> Street, NW  
Washington, DC 20005

Re: 2017 Client Security Fund fee payments  
Pro Hac Vice applications

To Whom It May Concern:

This office received your payment of the 2017 Client Security Fund fees in the amount of \$75.00 per person for Attorney C. Harker Rhodes, Attorney Paul D. Clement, and Attorney Erin E. Murphy on May 22, 2017.

If you have any questions, or if I can be of further assistance, please call me at the above telephone number, extension 3038, or email me at [jane.magi@ct.jud.gov](mailto:jane.magi@ct.jud.gov).

Sincerely,  
Jane Magi  
Administrative Clerk II



KIRKLAND &amp; ELLIS LLP

## CLIENT SECURITY FUND

20029595

DATE	INVOICE NUMBER	DESCRIPTION	BALANCE
05/18/2017	05182017B	S Shea Lindsey	75.00
CHECK DATE 05/19/2017	CHECK NUMBER 020029595	FILE COPY	TOTAL 75.00

120809

Seventy Five and 00/100 Dollars

020029595

05/19/2017

\*\*\*\*\*75.00

CLIENT SECURITY FUND  
PO BOX 1379  
HARTFORD, CT 06143-1379

DUPLICATE  
NON-NEGOTIABLE

## CLIENT SECURITY FUND

05/18/2017 05182017B

S Shea Lindsey

75.00

05/19/2017 020029595

FILE COPY

75.00