

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Michael Humphries, Acting Insurance
Commissioner of the Commonwealth
of Pennsylvania in her capacity as the
Statutory Rehabilitator of Senior
Health Insurance Company of
Pennsylvania (“SHIP”),

Plaintiff,

v.

Vanbridge, an EPIC Company, et al.,

Defendants.

DOCKET NO. 2 SHP 2022

ORDER

AND NOW, this ____ day of _____, 2026, upon
consideration of the Motion for Admission *Pro Hac Vice* of Shoshanah Shanes, it is
hereby ORDERED that said Motion is GRANTED and that Ms. Shanes is admitted
to appear *pro hac vice* on behalf of Dixon Hughes Goodman LLP.

BY THE COURT:

MARY HANNAH LEAVITT
President Judge Emerita

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DOCKET NO. 2 SHP 2022

MOTION FOR ADMISSION *PRO HAC VICE* OF SHOSHANAH SHANES

Brian Callaway, as attorney for Defendant Dixon Hughes Goodman LLP, respectfully moves the Court for an Order admitting Shoshanah Shanes of the law firm Lathrop GPM LLP to practice law before the Court, *pro hac vice*, pursuant to Rule 301 of the Pennsylvania Bar Admission Rules and Pennsylvania Rule of Civil Procedure 1012.1, and sets forth as follows:

1. Brian Callaway is admitted to practice before the Supreme Court of Pennsylvania and is an attorney with the law firm of Troutman Pepper Locke LLP, with offices at 3000 Two Logan Square, 18th and Arch Streets, Philadelphia, Pennsylvania 19103.

2. Shoshanah Shanes is an associate at Lathrop GPM LLP and is resident in the firm's office located at The Plaza at Clayton, 190 Carondelet Plaza, Suite 1400, Clayton, MO 63105.

3. Ms. Shanes is a member in good standing of the bar of the State of Missouri, before which she was admitted to practice on September 16, 2020. Her bar number there is 73010.

4. Ms. Shanes is admitted to practice law before the following courts:

State of Missouri Bar
Admission Date: September 16, 2020
Bar No: 73010

State of Illinois Bar
Admission Date: January 15, 2021
Bar No. 6335448

United States District Court for the Eastern District of Missouri
Admission Date: September 25, 2020
Bar No. 73010MO

United States District Court for the Western District of Missouri
Admission Date: September 29, 2020
Bar No. 73010MO

United States District Court for the Southern District of Illinois
Admission Date: October 20, 2020
Bar No. 6335448

United States District Court for the Northern District of Illinois
Admission Date: November 24, 2021
Bar No. 6335448

Seventh Circuit Court of Appeals
Admission Date: July 14, 2023
Bar No. 6335448

5. Ms. Shanes has never been reprimanded, suspended, or disbarred and is not subject to any disciplinary proceedings.

6. Ms. Shanes has been retained as counsel for Dixon Hughes Goodman LLP and is fully familiar with the facts and circumstances of the above-captioned litigation.

7. Ms. Shanes shall comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania and the Pennsylvania Rules of Professional Conduct.

8. Ms. Shanes shall submit to the jurisdiction of the Courts of Pennsylvania and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the above-captioned matter.

9. Ms. Shanes has consented to the appointment of Mr. Callaway as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the above-captioned matter.

10. Mr. Callaway has conducted a reasonable investigation and believes Ms. Shanes to be a reputable and competent attorney.

11. A true and correct copy of a Verification signed by Mr. Callaway is attached as Exhibit A.

12. A true and correct copy of a Verification signed by Shoshanah Shanes is attached as Exhibit B.

13. Ms. Shanes's fee payment certification and completed form for admission *pro hac vice* have been submitted to the Pennsylvania IOLTA Board. See Exhibit C.

WHEREFORE, for all of these reasons, Dixon Hughes Goodman LLP respectfully requests that Ms. Shanes be admitted to practice before this Court *pro hac vice* for all proceedings in connection with the above-captioned matter.

Dated: June 22, 2026

Respectfully submitted,



Brian H. Callaway
Troutman Pepper Locke LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
Brian.Callaway@Troutman.com
Direct: 215.981.4428

*Attorneys for Defendant Dixon Hughes Goodman
LLP*

OF COUNSEL:

Shoshanah Shanes
Lathrop GPM LLP
The Plaza at Clayton
190 Carondelet Plaza, Suite 1400
Clayton, MO 63105
Direct: 314.613.2846
shoshanah.shanes@lathropgpm.com

CERTIFICATE OF COMPLIANCE

Pursuant to Pennsylvania Rule of Appellate Procedure 127, I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.



Brian H. Callaway

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**MEMORANDUM OF LAW IN SUPPORT OF MOTION
FOR ADMISSION *PRO HAC VICE* OF SHOSHANAH SHANES**

Undersigned counsel, as attorney for Defendant Dixon Hughes Goodman LLP, respectfully submits this memorandum of law in support of its motion for *pro hac vice* admission of Shoshanah Shanes.

This motion is made pursuant to Pennsylvania Bar Admission Rule 301. In relevant part, Rule 301 states:

[a]n attorney, barrister or advocate who is qualified to practice in the courts of another state or of any foreign jurisdiction may be specially admitted to the bar of this Commonwealth for purposes limited to a particular matter.

Pa. Bar Adm. R. No. 301. *Pro hac vice* admission is authorized upon motion of a member of the Bar of this Commonwealth. Brian Callaway is a member of the Pennsylvania Bar in good standing and moves for the admission of Ms. Shanes. *Pro hac vice* admission is therefore authorized pursuant to Rule 301.

In addition, Pennsylvania Rule 1012.1 of Civil Procedure states that the “court shall grant the motion unless the court, in its discretion, finds good cause for denial.” Pa. R. Civ. P. 1012.1(e). Here, all such procedural requirements have been met by and there is no good cause for denial of the motion. Verified statements are attached as Exhibits A and B to the Motion in compliance with Pa. R. Civ. P. 1012.1(c) and (d).

WHEREFORE, Dixon Hughes Goodman LLP respectfully requests that the Court grant its Motion and admit Shoshanah Shanes to practice, *pro hac vice*, for all proceedings in connection with this matter.

Dated: June 22, 2026



Brian H. Callaway
Troutman Pepper Locke LLP
3000 Two Logan Square
Philadelphia, PA 19103-2799
Brian.Callaway@Troutman.com

Direct: 215.981.4428

*Attorneys for Defendant Dixon Hughes
Goodman LLP*

OF COUNSEL:

Shoshanah Shanes
Lathrop GPM LLP
The Plaza at Clayton
190 Carondelet Plaza, Suite 1400
Clayton, MO 63105
Direct: 314.613.2846
shoshanah.shanes@lathropgpm.com

EXHIBIT A

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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DOCKET NO.: 2 SHP 2022

VERIFICATION OF BRIAN CALLAWAY

I, Brian Callaway, verify and say that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am an attorney at the law firm of Troutman Pepper Locke LLP, counsel for Dixon Hughes Goodman LLP.
2. I am admitted to the Bar of the Commonwealth of Pennsylvania and I am an active member in good standing. My Pennsylvania attorney identification number is 316034.
3. I have never been disbarred or suspended from practice by any court, state or federal.
4. There is not now, nor has there ever been, any disciplinary proceeding pending against me as a member of the bar in any jurisdiction.

5. I am currently sponsoring the admission *pro hac vice* of one other attorney in a case docketed as Howard v. Doroshow, et al., No. 260301720, pending in the Court of Common Pleas of Philadelphia County.

6. After a reasonable investigation, I reasonably believe Shoshanah Shanes of the law firm Lathrop GPM LLP to be a reputable and competent attorney and I am in a position to recommend her admission *pro hac vice* in the above-entitled action.

7. The proceeds from a settlement of the above-entitled action, if any, will be received, held, distributed, and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Professional Conduct, including the IOLTA provisions thereof, if applicable.

8. I consent to my appointment as the agent upon whom service of process shall be made for all actions, including any disciplinary actions, that may arise out of Ms. Shanes's practice in the above-captioned matter.

I, Brian Callaway, verify that the foregoing is true and correct to the best of my knowledge, information, and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

[SIGNATURE PAGE FOLLOWS]

Dated: June 22, 2026



Brian Callaway (PA Attorney ID #316034)
Troutman Pepper Locke LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
215-981-4428
Brian.Callaway@Troutman.com

EXHIBIT B

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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Defendants.

DOCKET NO.: 2 SHP 2022

VERIFICATION OF SHOSHANAH SHANES

I, Shoshanah Shanes, verify and say that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am an associate at the law firm of Lathrop GPM LLP, located at 2345 Grand Boulevard, Suite 2200, Kansas City, MO 64108-2618 and 190 Carondelet Plaza, Suite 1400, Clayton, MO 63105.

2. I am a member in good standing of the bar of the State of Missouri, having been admitted to practice there on September 16, 2020. My bar number there is 73010.

3. I am also admitted to all Federal Courts in Missouri.

4. I am a member in good standing of the bar of the State of Illinois, having been admitted to practice there on January 15, 2021. My bar number there is 6335448.

5. I am also admitted to the United States District Court for the Southern District of Illinois and the United States District Court for the Northern District of Illinois.

6. I am also admitted to the Seventh Circuit Court of Appeals.

7. I have never been disbarred or suspended from practice by any court, state or federal.

8. There is not now, nor has there ever been, any disciplinary proceeding pending against me as a member of the bar in any jurisdiction.

9. There are no pending actions in any Pennsylvania court in which I have applied for *pro hac vice* admission, nor have I ever been denied *pro hac vice* admission in any Pennsylvania court.

10. I affirm that I will comply with and be bound by the applicable statutes, case law, and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

11. I affirm that I will submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to any acts or omissions occurring during the appearance in this matter for which my *pro hac vice* admission is sought.

12. I affirm that I have consented to the appointment of Brian Callaway, Esquire, of the law firm Troutman Pepper Locke LLP as sponsor for my *pro hac vice* admission and as agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in this matter for which my *pro hac vice* admission is sought.

13. I am associated in this litigation with the law firm Troutman Pepper Locke LLP, and I will participate with that firm in the representation of Dixon Hughes Goodman LLP in this matter.

I, Shoshanah Shanes, verify that the foregoing is true and correct to the best of my knowledge, information, and belief. This Verification is made subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

Dated: 6/21/26



Shoshanah Shanes
Lathrop GPM LLP
190 Carondelet Plaza Suite 1400
St. Louis, MO 63130
816.460.5326
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EXHIBIT C



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

June 16, 2026

SHOSHANAH SHANES, Esq.
LATHROP GPM LLP
190 CARONDELET PLAZA
STE 1400
CLAYTON, MO 63105

SENT TO PATRICK WAGNER VIA Email: PATRICK.WAGNER@GMAIL.COM

Dear Attorney SHANES:

This letter serves as the fee payment certification referenced in 204 Pa Code §81.503 and acknowledges receipt of the \$375.00 fee paid by Online Payment on this date related to your pursuit for admission *pro hac vice* in the case identified as HUMPHRIES V. VANBRIDGE, no. 2 SHP 2022, filed in the Commonwealth Court of Pennsylvania.

You should refer to Pa Rule of Civil Procedure 1012.1, local court rules, and other regulations of 204 Pa Code §81.501 et. seq. concerning additional requirements related to seeking *pro hac vice* admission.

Sincerely,

A handwritten signature in blue ink that reads "Stephanie S. Libhart".

Stephanie S. Libhart
Executive Director

cc: BRIAN HARRIS CALLAWAY, Esq.
BRIAN.CALLAWAY@TROUTMAN.COM

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