

**Karen O. Moury**

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July 22, 2014

**VIA E-FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

Re: Commonwealth of Pennsylvania, et al. v. Blue Pilot Energy, LLC  
Docket Nos. C-2014-2427655

Dear Secretary Chiavetta:

On behalf of Blue Pilot Energy, LLC, I have enclosed for electronic filing the Motion for Admission of Mark R. Robeck and Daniel S. Blynn *Pro Hac Vice* in the above-captioned matter.

Copies have been served on all parties as indicated in the attached certificate of service.

Very truly yours,



Karen O. Moury

KOM/tlg

Enclosure

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                |                                    |
|--------------------------------|------------------------------------|
| <b>COMMONWEALTH OF</b>         | :                                  |
| <b>PENNSYLVANIA, ET AL.,</b>   | :                                  |
|                                | :                                  |
| <b>Complainants,</b>           | :                                  |
|                                | :                                  |
| <b>v.</b>                      | : <b>Docket No. C-2014-2427655</b> |
|                                | :                                  |
| <b>BLUE PILOT ENERGY, LLC,</b> | :                                  |
|                                | :                                  |
| <b>Respondent.</b>             | :                                  |

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**MOTION FOR ADMISSION  
OF MARK R. ROBECK AND DANIEL S. BLYNN  
PRO HAC VICE ON BEHALF OF BLUE PILOT ENERGY, LLC**

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To the Honorable Elizabeth H. Barnes and the Honorable Joel Cheskis:

Pursuant to 52 Pa. Code § 1.22(b), Pa. Bar Adm. R. 301, 204 Pa. Code § 301, and Pa. R. Civ. P. 1021.1, the undersigned, an attorney admitted to the bar of the Commonwealth of Pennsylvania in good standing, hereby moves on behalf of Blue Pilot Energy, LLC. for the admission *pro hac vice* of Mark R. Robeck, Kelley Drye & Warren LLP, member of the bar of the District of Columbia (Attorney I.D. # 1010428), and Daniel S. Blynn, Kelley Drye & Warren LLP, member of the bar of the District of Columbia (Attorney I.D. # 488934), to appear *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC. The verified statements of Mark R. Robeck, Daniel S. Blynn and Karen O. Moury are attached hereto as Exhibits A, B and C and submitted in support of this motion.

Wherefore, for the reasons set forth above and in the Verified Statements attached hereto, the undersigned and Blue Pilot Energy, LLC respectfully request that this motion be granted.

Respectfully submitted,

Dated: July 22, 2014

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Karen O. Moury  
BUCHANAN INGERSOLL & ROONEY PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101-1357  
(717) 237-4820

*Attorneys for Blue Pilot Energy, LLC*

# Exhibit A

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                |                                    |
|--------------------------------|------------------------------------|
| <b>COMMONWEALTH OF</b>         | :                                  |
| <b>PENNSYLVANIA, ET AL.,</b>   | :                                  |
|                                | :                                  |
| <b>Complainants,</b>           | :                                  |
|                                | :                                  |
| <b>v.</b>                      | : <b>Docket No. C-2014-2427655</b> |
|                                | :                                  |
| <b>BLUE PILOT ENERGY, LLC,</b> | :                                  |
|                                | :                                  |
| <b>Respondent.</b>             | :                                  |

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**VERIFICATION OF KAREN O. MOURY**

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I, Karen O. Moury, state as follows in support of the motion for my admission of Mark R. Robeck and Daniel S. Blynn *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC:

1. I have entered an appearance as attorney of record in the above-captioned matter on behalf of Blue Pilot Energy, LLC.

2. After reasonable investigation, I believe Mark. R. Robeck and Daniel S. Blynn to be reputable and competent attorneys, and I am in a position to recommend their admission to appear *pro hac vice* on behalf of Blue Pilot Energy, LLC.

3. I am currently not acting as a sponsor of any other candidate in any court of record of the Commonwealth of Pennsylvania or before the Pennsylvania Public Utility Commission.

4. No settlement proceeds from this action are anticipated; however, any such proceeds shall be received, held, distributed and accounted for in accordance with Rule 1.15 of the Pennsylvania Rules of Conduct, including the IOLTA provisions thereof, if applicable.

I hereby verify that the foregoing is true and correct, subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities.)

Dated: July 22, 2014

  
Karen O. Moury  
BUCHANAN INGERSOLL & ROONEY PC  
409 North Second Street, Suite 500  
Harrisburg, PA 17101-1357  
(717) 237-4820

*Attorneys for Blue Pilot Energy, LLC*

# Exhibit B

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|  |                                    |
|--|------------------------------------|
| <b>COMMONWEALTH OF<br/>PENNSYLVANIA, ET AL.,</b> | :                                  |
|  | :                                  |
|  | :                                  |
| <b>Complainants,</b>                             | :                                  |
|  | :                                  |
| <b>v.</b>  | <b>: Docket No. C-2014-2427655</b> |
|  | :                                  |
| <b>BLUE PILOT ENERGY, LLC,</b>                   | :                                  |
|  | :                                  |
| <b>Respondent.</b>                               | :                                  |

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**VERIFICATION OF MARK R. ROBECK**

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I, Mark R. Robeck, state as follows in support of the motion for my admission *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC:

1. I am currently a member of the bars of the District of Columbia (Attorney I.D. No. 1010428) and Texas (Attorney I.D. No. 16990040). I am not and have never been suspended, disbarred or otherwise disciplined by any jurisdiction, nor am I subject to disciplinary proceedings in any jurisdiction.

2. I have applied for and been admitted *pro hac vice* in one other matter in Pennsylvania: Sunoco Inc. (R&M) vs. Kimberly-Clark Pennsylvania, LLC, *et al.*, Civil Action No. 2:13-cv-01822, before the United States District Court for the Eastern District of Pennsylvania.

I shall 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.

3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance *pro hac vice* in this matter.

4. I consent to the appointment of Karen O. Moury as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of my practice of law in this matter.

I hereby verify that the foregoing is true and correct, subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities.)

Dated: July 21, 2014



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Mark R. Robeck, DC, Atty. I.D. # 1010428  
KELLEY DRYE & WARREN LLP  
3050 K Street, NW, Suite 400  
Washington, DC 20007  
Telephone: (202) 342-8400  
Facsimile: (202) 342-8451

# Exhibit C

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                |                                    |
|--------------------------------|------------------------------------|
| <b>COMMONWEALTH OF</b>         | :                                  |
| <b>PENNSYLVANIA, ET AL.,</b>   | :                                  |
|                                | :                                  |
| <b>Complainants,</b>           | :                                  |
|                                | :                                  |
| <b>v.</b>                      | : <b>Docket No. C-2014-2427655</b> |
|                                | :                                  |
| <b>BLUE PILOT ENERGY, LLC,</b> | :                                  |
|                                | :                                  |
| <b>Respondent.</b>             | :                                  |

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**VERIFICATION OF DANIEL S. BLYNN**

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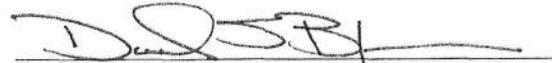
I, Daniel S. Blynn, state as follows in support of the motion for my admission *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC:

1. I am currently a member of the bar of the District of Columbia (Attorney I.D. No. 488934). I am not and have never been suspended, disbarred or otherwise disciplined by any jurisdiction, nor am I subject to disciplinary proceedings in any jurisdiction.
2. I have not applied for admission *pro hac vice* in any other Pennsylvania forum. I shall 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.
3. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during my appearance *pro hac vice* in this matter.

4. I consent to the appointment of Karen O. Moury as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of my practice of law in this matter.

I hereby verify that the foregoing is true and correct, subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities.)

Dated: July 21, 2014



Daniel S. Blynn, DC Atty. In P. #488934  
KELLEY DRYE & WARREN LLP  
3050 K Street, NW, Suite 400  
Washington, DC 20007  
Telephone: (202) 342-8400  
Facsimile: (202) 342-8451

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**COMMONWEALTH OF  
PENNSYLVANIA, ET AL.**

**Complainants,**

**v.**

**BLUE PILOT ENERGY, LLC**

**Respondent.**

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**Docket Nos. C-2014-2427655**

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

**Via First-Class Mail**

John M. Abel  
Margarita Tulman  
Bureau of Consumer Protection  
Office of Attorney General  
15<sup>th</sup> Floor, Strawberry Square  
Harrisburg, PA 17120

Candis A. Tunilo  
Christy M. Appleby  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101

Sharon E. Webb  
Office of Small Business Advocate  
300 N. Second Street, Suite 1102  
Harrisburg, PA 17101

Dated this 22<sup>nd</sup> day of July, 2014.



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Karen O. Moury, Esq.