

**Karen O. Moury**

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October 10, 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 No. C-2014-2427655

Dear Secretary Chiavetta:

On behalf of Blue Pilot Energy, LLC, I have enclosed for electronic filing the Motion for Admission of Catherine M. Wilmarth 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 CATHERINE M. WILMARTH  
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 Catherine M. Wilmarth, Kelley Drye & Warren LLP, member of the bar of Maryland (Attorney I.D. #1212130296), to appear *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC. The verified statements of Catherine M. Wilmarth and Karen O. Moury are attached hereto as Exhibits A and B and are 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: October 10, 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 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 CATHERINE M. WILMARTH**

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I, Catherine M. Wilmarth, 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 Maryland (Attorney I.D. No. 1212130296). 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.

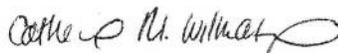
2. I have not applied for admission *pro hac vice* in any other Pennsylvania forum. I shall comply with and be bound by the applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, including the Pennsylvania Rules of Professional Conduct.

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: October 10, 2014



Catherine Wilmarth, MD Atty. I.D. #1212130296  
KELLEY DRYE & WARREN LLP  
3050 K Street, NW, Suite 400  
Washington, DC 20007  
Telephone: (202) 342-8400  
Facsimile: (202) 342-8451

## EXHIBIT B

**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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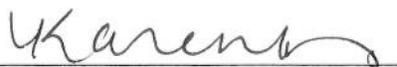
I, Karen O. Moury, state as follows in support of the motion for my admission of Catherine M. Wilmarth *pro hac vice* in the above-captioned matter on behalf of Blue Pilot Energy, LLC:

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 Catherine M. Wilmarth 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 sponsoring Mark R. Robeck and Daniel S. Blynn in the above-captioned proceeding pending before the Pennsylvania Public Utility Commission (“Commission”). I am not currently acting as a sponsor of any other candidate in any court of record of the Commonwealth of Pennsylvania or before the 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: October 10, 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*



Steve Estomin  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway  
Suite 300  
Columbia, Maryland 21044

Dated this 10<sup>th</sup> day of October, 2014.

A handwritten signature in cursive script, appearing to read "Karen O. Moury", written above a horizontal line.

Karen O. Moury, Esq.