

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	R-2018-3000164
v.	:	
	:	
PECO Energy Company	:	

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 5.103 of the rules of Administrative Practice and Procedure of the Pennsylvania Public Utility Commission and Rule 301(b) of the Pennsylvania Bar Admission Rules, Attorney of Record for ChargePoint, Inc. (ChargePoint), Reizdan B. Moore, respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission *pro hac vice* to Scott Dunbar as counsel for ChargePoint for all purposes in relations to this proceeding. In support of this Motion, the Movant, Reizdan B. Moore, avers as follows:

1. I am an active member of the Bar of the Pennsylvania Supreme Court (Attorney I.D. No. 28337). Pursuant to PUC Rule 1.24, I have entered my appearance as counsel of record for ChargePoint in this proceeding.

2. Scott Dunbar is an attorney employed by Keyes & Fox, LLP, which is located at 1580 Lincoln St., Suite 880, Denver, CO 80203. He is a graduate of the University of Colorado School of Law. He was admitted to practice law in the State of Colorado in 2012 and is currently on active status and is in good standing (Attorney No. 44521). Mr. Dunbar has experience with proceedings before state utility commissions in

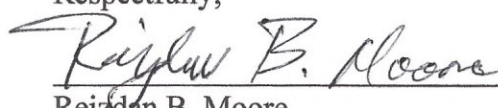
Colorado, Oregon, Hawaii, Minnesota, Nevada, and Illinois. Mr. Dunbar has never been suspended, disbarred or been the subject of disciplinary proceedings in Pennsylvania or any other state.

3. Mr. Dunbar agrees to be bound by and comply with applicable statutes, case law and procedural rules of the Commonwealth of Pennsylvania, the Pennsylvania Rules of Professional Conduct and the Rules of this Commission. Mr. Dunbar agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during his appearance in this matter.

4. Mr. Dunbar has consented to the appointment of Reizdan B. Moore as his sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of ChargePoint.

WHEREFORE, Reizdan B. Moore, Movant and Counsel of Record for ChargePoint, respectfully moves for the admission of Scott Dunbar to appear in this matter *pro hac vice* for ChargePoint for all permissible purposes in relation to this proceeding.

Date: July 3, 2018

Respectfully,

Reizdan B. Moore
PA I.D. No.: 28337
Reizdan B. Moore, LLC
Attorney at Law
3544 N. Progress Avenue
Suite 108
Harrisburg, PA 17110
(717) 409-8336
Reizdan.moorelaw@comcast.net

Attorney for ChargePoint, Inc.

**BEFORE THE
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**SPONSOR’S VERIFIED STATEMENT IN SUPPORT OF MOTION FOR
ADMISSION
*PRO HAC VICE***

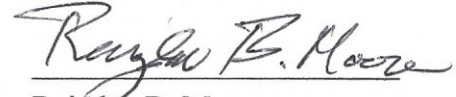
I, Reizdan B. Moore, state the following:

1. After reasonable investigation, I reasonably believe that Scott Dunbar is a responsible and competent attorney. Accordingly, I am in a position to recommend his admission *pro hac vice* in the above-captioned matter.
2. Any proceeds from the settlement of a cause of action in which the candidates are granted admission *pro hac vice* shall 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.
3. I shall remain the attorney of record for this case, as required by the Rules of Civil Procedure.
4. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing

were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsifications to authorities).

Date: July 3, 2018

Respectfully,



Reizdan B. Moore
PA I.D. No.: 28337
Reizdan B. Moore, LLC,
3544 N. Progress Avenue
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(717) 409-8336
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Attorney for ChargePoint, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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VERIFIED STATEMENT OF SCOTT DUNBAR FOR ADMISSION PRO HAC VICE

Pursuant to 52 Pa. Code §§1.22(b) and 5.103 and Pa. Rule of Civil Procedure 1012.1, Reizdan B. Moore, a member of the bar of the Supreme Court of Pennsylvania (Pa. ID. No. 28337), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, Scott Dunbar, submit this verified statement:

1. I am admitted to practice in and am a member in good standing of the bar of Colorado (Attorney No. 44521), having been admitted in 2012. I have never been suspended, disbarred, or otherwise disciplined nor am I currently the subject of any disciplinary proceeding.

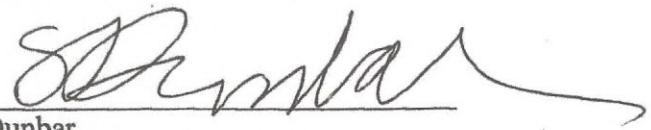
2. I have not previously sought permission to appear *pro hac vice* in any judicial or administrative proceeding in the Commonwealth of Pennsylvania.

3. 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.

4. I shall submit to the jurisdiction of the Pennsylvania courts and the Pennsylvania Disciplinary Board with respect to acts and omissions occurring during the appearance in the matter for which admission *pro hac vice* is being sought.

5. I consent to the appointment of the sponsoring attorney, Reizdan B. Moore, 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 matter for which admission *pro hac vice* is sought.

6. I verify that the facts set forth herein are true and correct, to the best of my knowledge, information and belief, and that I would be able to prove the same if a hearing were held regarding such facts. I understand that the statements are made subject to the penalties of 18 Pa. C.S. §4904 (relating to falsifications to authorities).

/s/ 

Scott Dunbar
Keyes & Fox, LLP
1580 Lincoln St., Suite 880
Denver, CO 80203
sdunbar@keyesfox.com
949-525-6016

Date: July 3, 2018



SUPREME COURT OF PENNSYLVANIA
PENNSYLVANIA INTEREST ON
LAWYERS TRUST ACCOUNT BOARD

July 03, 2018

SCOTT FRENCH DUNBAR, Esq.
KEYES & FOX, LLP
1580 LINCOLN ST., STE. 880
DENVER, CO 80203

SENT TO SCOTT DUNBAR VIA Email: SDUNBAR@KEYESFOX.COM

Dear Attorney DUNBAR:

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 Pennsylvania Public Utility Commission v. PECO Energy Company, no. R-2018-3000164, 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: REIZDAN B. MOORE, Esq.
reizdan.moorelaw@comcast.net

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paiolta@pacourts.us · www.paiolta.org

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy the Motion For Admission *Pro Hac Vice* of ChargePoint, Inc., upon the following persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code §1.54:

Via Email and/or First Class Mail

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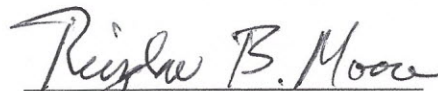
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Respectfully,


Reizdan B. Moore, Esquire