

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :

:

v.

:

Docket No. R-2018-3002645

:

R-2018-3002647

Pittsburgh Water and Sewer Authority :

:

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 Pittsburgh UNITED, Peter J. DeMarco, respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission *pro hac vice* to Dimple Chaudhary as counsel for Pittsburgh UNITED for all purposes in relation to this proceeding. In support of this Motion, the Movant, Peter J. DeMarco, avers as follows:

1. I am an active member of the Bar of the Pennsylvania Supreme Court (PA ID: 319087). Pursuant to 52 Pa. Code § 1.24(b)(1), I have entered my appearance as counsel of record for Pittsburgh UNITED in this proceeding.

2. Dimple Chaudhary is an attorney employed by the Natural Resources Defense Council, which is located at 1152 15th St. NW, Suite 300, Washington, DC 20005. She is a graduate of Columbia Law School. She is admitted to practice law in New York (Attorney No. DC 5349, admitted 2006) and Washington, D.C. (Attorney No. 1004422, admitted 2011). She is currently on active status and is in good standing. Ms. Chaudhary has never been suspended, disbarred, or been the subject of disciplinary proceedings in Pennsylvania or any other state.

3. Ms. Chaudhary 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. Ms. Chaudhary agrees to submit to the jurisdiction of the Pennsylvania Courts and Pennsylvania Disciplinary Board with respect to acts and omissions occurring during her appearance in this matter.

4. Ms. Chaudhary has consented to the appointment of Peter J. DeMarco as her sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of Pittsburgh UNITED.

WHEREFORE, Peter J. DeMarco, Movant and Counsel of Record for Pittsburgh UNITED, respectfully moves for the admission of Dimple Chaudhary to appear in this matter *pro hac vice* for Pittsburgh UNITED for all permissible purposes in relation to this proceeding.

Respectfully submitted,



Peter J. DeMarco, PA ID: 319087
Natural Resources Defense Council
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**SPONSOR’S VERIFIED STATEMENT IN SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE**

I, Peter J. DeMarco, state the following:

1. After reasonable investigation, I reasonably believe that Dimple Chaudhary is a reputable and competent attorney. Accordingly, I am in a position to recommend her admission *pro hac vice* in the above-captioned matter.

2. The above-captioned matter is the only matter in the courts of the Commonwealth or before this Commission in which I am acting as the sponsor of a candidate for admission *pro hac vice*.

3. Any proceeds from the settlement of a cause of action in which Ms. Chaudhary is 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.

4. I shall remain the attorney of record for this case, as required by the Pennsylvania Rules of Civil Procedure.

5. 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 13, 2018

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Peter J. DeMarco", is positioned above a horizontal line.

Peter J. DeMarco, PA ID: 319087
Natural Resources Defense Council
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**VERIFIED STATEMENT OF DIMPLE CHAUDHARY IN SUPPORT OF MOTION FOR
ADMISSION PRO HAC VICE**

Pursuant to 52 Pa. Code §§ 1.22(b) and 5.103 and Rule of Civil Procedure 1012.1, Peter J. DeMarco, a member of the bar of the Supreme Court of Pennsylvania (PA ID: 319087), is moving for my admission *pro hac vice* in the above-captioned proceeding. In support of said sponsor's motion, I, the candidate, Dimple Chaudhary, submit this verified statement:

1. I am admitted to practice in and am a member in good standing of the bars of New York (Attorney No. DC 5349, admitted 2006) and Washington, D.C. (Attorney No. 1004422, admitted 2011). 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.

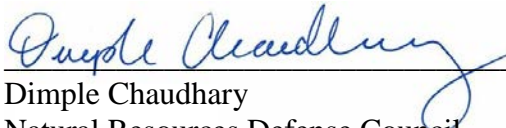
5. I consent to the appointment of the sponsoring attorney, Peter J. DeMarco, as the agent upon whom service of process shall be made for all actions, including disciplinary actions, that may arise out of the practice of law in the matter for which admission *pro hac vice* is sought.

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).

Date: July 12, 2018

Respectfully submitted,



Dimple Chaudhary
Natural Resources Defense Council
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dchaudhary@nrdc.org

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Certificate of Service

I hereby certify that I have this day served copies of the **Motion for Admission Pro Hac Vice** upon the parties of record in the above-captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA FIRST CLASS MAIL AND EMAIL

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Respectfully submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Co-Counsel for Pittsburgh UNITED

A handwritten signature in black ink, appearing to read "John W. Sweet". The signature is stylized with a large, sweeping "S" and a horizontal line above it.

John W. Sweet, Esq., PA ID: 320182
118 Locust Street
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717-236-9486
pulp@palegalaid.net

July 13, 2018