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VIA eFILING

June 2, 2020

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17105-3265

Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company *Docket Nos. R-2020-3019369 and R-2020-3019371*

Dear Secretary Chiavetta:

Please find enclosed AK STEEL CORPORATION'S MOTION FOR ADMISSION PRO HAC VICE AND VERIFIED STATEMENTS for filing in the above-captioned proceeding.

By copy of this letter, all parties listed on the Certificate of Service have been served.

Respectfully submitted,

/s/ Michael L. Kurtz Michael L. Kurtz, Esq.. (PA Attorney I.D. #71687) Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq. BOEHM, KURTZ & LOWRY COUNSEL FOR AK STEEL CORPORATION

MLKkew

cc: The Honorable Charles E. Rainey, Jr. (email only <u>crainey@pa.gov</u>)
The Honorable Conrad A. Johnson (email only <u>cjohnson@pa.gov</u>)
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	2			
VS.				
Pennsylvania American Water Company	:	Docket Nos.	R-2020-3019369 (Water)	
	:		R-2020-3019371 (Wastewater)	
	:			

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 AK Steel Corporation ("AK Steel"), Michael L. Kurtz respectfully requests the Presiding Administrative Law Judge to enter an Order granting admission pro hac vice to Kurt J. Boehm and Jody Kyler Cohn as counsel for AK Steel for all purposes in relation to this proceeding. In support of this Motion, the Movant, Michael Kurtz, states as follows:

- 1. I am an active member of the Bar of the Pennsylvania Supreme Court (PA ID: 71687). Pursuant to 52 Pa. Code § 1.24(b)(1), I have entered my appearance as counsel of record for AK Steel in this proceeding.
- 2. Mr. Boehm and Ms. Cohn are licensed attorneys in good standing in Ohio and Kentucky. Mr. Boehm and Ms. Cohn have never been suspended, disbarred, or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.
- 3. Mr. Boehm and Ms. Cohn agree 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. Boehm and Ms. Cohn agree 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. Mr. Boehm and Ms. Cohn have consented to the appointment of Michael Kurtz as their sponsor, who has filed his notice of appearance in this matter and who will remain counsel of record on behalf of AK Steel.
- 5. Mr. Boehm and Ms. Cohn's Verified Statements for Admission Pro Hac Vice are attached.

WHEREFORE, Michael L. Kurtz, Movant and Counsel of Record for AK Steel Corporation, respectfully moves for the admission of Kurt Boehm and Jody Kyler Cohn to appear in this matter pro hac vice for AK Steel Corporation for all permissible purposes in relation to this proceeding.

Respectfully submitted,

Michael L. Kurtz, Esq. (PA Atty. I.D. #71687)

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764 e-mail:mkurtz@BKLlawfirm.com

June 2, 2020

ATTORNEYS FOR AK STEEL CORPORATION

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission			
vs. Pennsylvania American Water Company	:	Docket Nos.	R-2020-3019369 (Water) R-2020-3019371 (Wastewater)

VERIFIED STATEMENT OF KURT J. BOEHM FOR ADMISSION PRO HAC VICE

Pursuant to 52 Pa. Code§§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Michael L. Kurtz, Esq., a member of the bar of the Commonwealth of Pennsylvania (Pa.I.D. No. 71687), is moving for my admission pro hac vice in the above-captioned proceeding. In support of said sponsor's Motion, I, the candidate, submit this verified statement, pursuant to Pa. R.C.P. 012.1:

- I am a licensed attorney in good standing in Ohio and Kentucky. I have never been suspended, disbarred or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.
- 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 the appearance in the matter for which admission pro hac vice is being sought.
- 4. I consent to the appointment of the sponsoring attorney, Michael L Kurtz, Esq. 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.

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 these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,

Kurt J. Boehm, Esq.

BOEHM, KURTZ & LOWRY 36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764 e-mail: <u>kboehm@BKLlawfirm.com</u>

June <u>1</u>, 2020

Subscribed to and sworn before me this 1st day of June, 2020.

Votary Public

My Commission expires



Jody M. K. Cohn, Attorney At Lew NOTARY PUBLIC - STATE OF OHIO My commission has no expiration date Sec. 147.03 R.C.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	it		
VS.	1:		
Pennsylvania American Water Company	1	Docket Nos.	R-2020-3019369 (Water)
	*		R-2020-3019371 (Wastewater)

VERIFIED STATEMENT OF JODY KYLER COHN FOR ADMISSION PRO HAC VICE

Pursuant to 52 Pa. Code§§ 1.22(b) and 5.103, Pa. B.A.R. 301 and Pa. R.C.P. 1012.1, Michael L. Kurtz, Esq., a member of the bar of the Commonwealth of Pennsylvania (Pa.I.D. No. 71687), is moving for my admission pro hac vice in the above-captioned proceeding. In support of said sponsor's Motion, I, the candidate, submit this verified statement, pursuant to Pa. R.C.P. 012.1:

- I am a licensed attorney in good standing in Ohio and Kentucky. I have never been suspended, disbarred or resigned as a result of a disciplinary charge, investigation, or proceeding from the practice of law in any jurisdiction, nor are any such disciplinary proceedings pending.
- 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 the appearance in the matter for which admission pro hac vice is being sought.
- 4. I consent to the appointment of the sponsoring attorney, Michael L Kurtz, Esq. 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.

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 these statements are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to falsification to authorities).

Respectfully submitted,

Lody Kyler Cohn, Eso

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: 513.421.2255 Fax: 513.421.2764 e-mail: jkylercohn@BKLlawfirm.com

June ⊥, 2020

Subscribed to and sworn bef

this ____ day of June, 2

Notary Public
My Commission expir

KURT J. BOEHM ATTORNEY AT LAW

> NOTARY PUBLIC STATE OF OHIO

My Commission Has No Expiration Date Sec 147.03 O.R.C.

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 2020 I served a true copy of AK STEEL CORPORATION'S MOTION FOR ADMISSION PRO HAC VICE AND VERIFIED STATEMENTS via email only upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq. (PA Attorney I.D. # 71687) Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq.

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